

## HYUNDAI CONNECTED MOBILITY GMBH

### PRIVACY NOTICE – IN-CAR HYUNDAI BLUELINK AND GENESIS CONNECTED SERVICES

#### FOR HYUNDAI AND GENESIS BRAND VEHICLES

VERSION: 8 September 2025

##### List of changes

- This privacy notice now applies to Hyundai and Genesis brand vehicles.
- Starting from the 8th of October 2025, Genesis Connected Services will be provided by Hyundai Connected Mobility GmbH, a partner company of Hyundai Motor Group. Please note the respective changes of the data controller and contact details of the data controller in Sections 2 and 3.
- Section 4.1.2 We have updated the purposes of data processing. This change becomes effective from 12th of September 2025.
- Section 4.2.2 **Hyundai/Genesis Live** has been updated with a new feature (Google Places POI search) and additional data transfer.
- Section 6.2 Sharing of personal data at your request has been added. This change becomes effective from 12th of September 2025.
- Section 13 Processing of data of an authorised user has been added. This change becomes effective from 12th of September 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 Hyundai Bluelink Europe Services ("**Bluelink**") and Genesis Connected Services ("**GCS**") (or together as "**Services**") to you via the car's infotainment system (this is the Head Unit of your vehicle).

This Privacy Notice will apply whenever you use the Services available inside the vehicle infotainment system of your Hyundai and/or Genesis brand vehicles listed in Section 14.

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 Hyundai/Genesis 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 in Kaiserleipromenade 5, 63067 Offenbach, Germany ("HCM") is the provider of the Services and responsible for the processing of your personal data as explained in this Privacy Notice.

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

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

In regard to specific Services as listed in Section 6, we will act as a joint controller together with affiliated companies of the Hyundai group and/or the authorized Hyundai/Genesis Distributor in your country of purchase.

You can find the full names and contact data of the respective joint-controllers in Section 14.

We and the joint controller enter into an agreement governing the processing of personal data.

Upon request, we will provide information on the essence of such an agreement to you.

#### 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 HCM's customer call centre at the phone number +49 69271472377. You may also contact HCM by

sending an email to support.bluelink@hyundai-europe.com (for Hyundai vehicles) or mygenesis@eu.genesis.com (for Genesis vehicles).

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 LAWFUL BASIS?**

##### **4.1.OUR PROCESSING OF YOUR PERSONAL DATA**

###### **4.1.1.PROVISION OF THE 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 the performance of the Services contract (Art. 6 (1) b) GDPR),
- where required by law (Art. 6 (1) c) GDPR),
- where based on your consent (Art. 6 (1) a) GDPR), or
- where it is necessary for the purposes of our legitimate interests or those of third parties (Art. 6 (1) f) GDPR).

Not all Services may be available for use with your specific vehicle – this may depend on your Hyundai or Genesis brand vehicle model the software version of the infotainment system or the Bluelink package selected (Hyundai brand vehicles). For details on individual Services, please look at the relevant service description in the Terms of Use - In-Car Hyundai Bluelink and Genesis Connected Services.

All (personal) data described in Sections 4.2 and 4.3 and their subsections below is collected directly from your vehicle (e.g. its sensors and related applications as made accessible through the Infotainment system) and is processed in connection with the Services.

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

Furthermore, we will additionally process your Vehicle Identification Number (VIN), the categories of Services that you have activated and the initial activation date. The lawful basis is Art. 6 (1) b) GDPR (entering into a contract and performing our Services).

###### **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 in more detail below.

- **Product improvement / development:** If you agree, 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 if you have either activated all Services or selected the "Product/Service Improvement" service category in the privacy settings of your infotainment system. More details are provided in Section 4.3.

The lawful basis for any such processing is Art. 6 (1) f) GDPR (legitimate interests of HCM and the Hyundai/Genesis Distributor to process your personal data 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 lawful basis for any such processing is Art. 6 (1) f) GDPR (legitimate interests of HCM and the Hyundai/Genesis Distributor to process your personal data for the purposes as indicated above).

- **Fulfilling legal obligations:** We process your personal data in order to fulfil various legal obligations (Art. 6 (1) c) GDPR), in particular laws applicable to car manufacturers. Examples of such obligations include:
  - provision of certain functionalities in the car such as the “eCall” in accordance with regulation (EU) 2015/758,
  - reporting of certain information (i.e. related to the functioning of the intelligent speed assistance – ISA, Driver Control Assistance Systems – DCAS, etc.) to the relevant national and/or European authorities, on the basis of regulation (EU) 2019/2144;
  - provision of information to courts or criminal prosecution authorities based on applicable criminal or administrative laws.
- **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), 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, HCM and/or the Hyundai/Genesis Distributor will provide you with additional information where appropriate.

#### **Processing of aggregated data**

We may aggregate data collected in the way described in the Privacy Notice to the degree where it will no longer be possible to attribute such data to you or your vehicle and the data will no longer be considered personal data.

In such case, we may process such non-personal data for the above purposes and use it for other legitimate economic endeavours ourselves or with external partners. Any sharing with external partners is limited to aggregated data for the specified purposes and is subject to contractual safeguards.

The lawful basis for the aggregation (removal of personal information) is Art. 6 (1) f) GDPR (legitimate interests of Hyundai and the Hyundai Distributor to process aggregated data derived from personal data in order to develop and improve our Services or serve general business needs by way of conducting business analytics and similar purposes).

#### **4.1.3.NO AUTOMATED DECISION-MAKING**

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

#### **4.2.PROVISION OF THE SERVICES – VEHICLE INFOTAINMENT SYSTEM**

##### **4.2.1.PRIVACY SETTINGS**

In the privacy settings of your infotainment system, you have the option to activate all in-vehicle Services, only select certain categories of the Services or activate offline mode at any time. We will only process the data that is necessary to provide you with the Services that you have selected according to the information provided below.

##### **4.2.2.HYUNDAI/GENESIS LIVE (BRANDED PINS AND IN-CAR OFFERS FOR HYUNDAI BRAND VEHICLES ONLY)**

Hyundai/Genesis 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 & Genesis 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, including branded pins and promoted searches with in-car offers, allowing you to benefit from promotions of third-party vendors in various POI categories
- Google Places POI Search: Live and detailed information on locations from one of the largest databases including a free text search and autocomplete functions.
- 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/Genesis 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.

With regard to live POIs that contain advertising content from third parties, it may be necessary to transfer the following data to our service provider (4.screen GmbH, Sailerstraße 17, 80809 Munich, Germany) in order to provide you with relevant information as requested: approximate search area, search term, search (POI) category, device ID, approximate location of the device, Head Unit language and generation, car brand, engine type (e.g. EV or petrol), vehicle class (e.g. small, SUV), vehicle production year and vehicle country.

Furthermore, if relevant information and offers are provided to you, a unique offer ID is created. This offer ID is also transferred to our service provider together with the event type (e.g. shown, clicked, navigation started), screen type (e.g. Head Unit, app) and the timestamp of when the offer was interacted with in order to validate the invoicing process.

If you arrive and park at certain POIs, we also transfer the following data related to this event to our service provider so that they can measure the effectiveness of the third-party content and improve the services offered: GPS parking position with latitude/longitude blurred beyond 4 digits after the decimal point (no exact location data) and the day of the parking event (no exact timestamp) together with the device ID and offer ID.

In connection with the provision of Google Places POI Search, we may also process: GPS location data, the Head Unit language, search term, engine type and device ID.

Additionally, if offers and information from the vehicle are sent directly to the Bluelink app as push notifications, we also process your user profile ID, e.g. your email address.

We process your personal data for these purposes in order to perform our Services (Art. 6 (1) b) GDPR).

#### **4.2.3. 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/GCS 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 GmbH, Aachen, Germany, 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 GmbH 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/GCS 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 GmbH, Aachen, Germany (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.

#### **4.2.4. 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).

To the extent that we 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 4.3 below.

#### **4.2.5. 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/GCS 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/GCS 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 these purposes in order to perform our Services (Art. 6 (1) b) GDPR).

#### **4.2.6. PREFERRED ROUTE**

Preferred route guidance allows you to compare your frequently travelled routes between a specific starting point and destination to provide you with a route calculation that matches your preferences.

For this function, the following categories of personal data are processed and sent to our Bluelink/GCS cloud environment: Your vehicle's SIM card (ICCID) and your frequently travelled routes, including destination information and actual route data.

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

#### **4.2.7. 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 lawful basis for the processing of your data for these purposes is our legitimate interest in improving the Services (Art. 6 (1) f) GDPR).

#### **4.2.8.EMERGENCY VEHICLE APPROACHING**

To notify you in the Head Unit when an emergency vehicle such as an ambulance is approaching, the following categories of personal data are processed: contact details, vehicle data, pseudonymised identifiers, position and movement data, usage-based data, technical data, dynamic traffic information

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

#### **4.2.9.USER PROFILE**

The user profile allows you to create backups of your profile including vehicle settings 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 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, 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).

#### **4.2.10.FINGERPRINT IDENTIFICATION (SELECTED GENESIS BRAND VEHICLE MODELS ONLY)**

The GCS user Profile allows you to set up fingerprint identification for each user profile. By setting your fingerprint, you can use fingerprint identification instead of a password for functions such as starting the vehicle, unlocking your profile and exiting valet mode.

For each user profile the following personal data is processed within the car: fingerprint, fingerprint profile created from fingerprint data. The latter is a pseudonymised identifier that does not allow any reference to a natural person and is especially encrypted.

The fingerprint information is processed locally in the car only and stored in encrypted form.

We process your personal data based on your consent (Art. 6 (1) a) and Art. 9 (2) a) GDPR). You may withdraw your consent at any time with effect for the future by deleting your fingerprint data directly in the vehicle. The fingerprint data will be instantly deleted in the storage in the vehicle where it is securely stored. Please note that this does not affect the lawfulness of the processing that was carried out on the basis of the consent until the withdrawal.

#### **4.2.11.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 infotainment system ("Settings" -> "Bluelink/Genesis Connected Services" -> "Privacy Settings").

Alternatively, you can deactivate connectivity via the infotainment system in your vehicle ("Settings" -> "Bluelink/Genesis Connected Services" -> "Bluelink/Genesis Connected Services").

However, if you turn off OTA updates, your vehicle or the services provided (such as security-related systems, infotainment system, Bluelink/GCS) may not function properly.

#### **4.2.11.1. VEHICLE SYSTEM OTA SOFTWARE 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.

In this we will also ensure an efficient deployment and monitoring of OTA updates concerning the vehicle system.

For this purpose, the following categories of personal data are processed and sent to our GCS cloud environment: your Vehicle Identification Number (VIN), 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 complying with the legal obligations of the vehicle manufacturer (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 (Art. 6 (1) f) GDPR).

#### **4.2.11.2. MAPS AND INFOTAINMENT OTA SOFTWARE 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 GCS 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).

#### **4.2.12. 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.

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).

#### **4.2.13. 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/GCS 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).

#### **4.2.14. '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).

#### **4.2.15. MUSIC STREAMING**

With the music streaming feature, you can stream music in your vehicle directly from certain music streaming services via the infotainment system. To use this feature, you need a valid subscription for the respective music streaming service and your phone with the myHyundai/MY GENESIS app installed for the activation process.

To link your account with the chosen music streaming service, your login credentials are first processed by the music streaming platform and then transferred to us in pseudonymized form before being stored in our Bluelink/GCS cloud environment.

Information about which music content you search for and select is transferred from the vehicle to our GCS cloud environment. A request is then sent to the respective music streaming platform, which then provides the music content directly to the vehicle. Recently played music content is temporarily stored in the vehicle's system.

For this purpose, the following categories of personal data are processed: user authentication data (e.g. pseudonymized login credentials for the streaming platform account, device ID, user ID), service information (service authorization code, subscription status, login data, service ID, session ID), vehicle information (VIN or vehicle ID, engine type, country of sale, model name, model year, Head Unit platform, Head Unit model) as well as information about the requested music content (e.g. unique identifier, type, name, title, artist, album name, genre, duration, date of the content, URLs).

Your platform streaming account stored in the vehicle is linked to your individual user profile in the vehicle. Deleting your user profile will automatically unlink the platform streaming account from the vehicle.

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

#### **4.3. DATA ANALYSIS FOR PRODUCT IMPROVEMENT AND DEVELOPMENT**

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

The data used for these purposes is in general limited to technical data.

Such data is 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 4.2.4.

To assure greater efficiency of the data analysis, we may also collect additionally information which allows for identification of a natural person (such as VIN, account and subscription data, where relevant and if enabled GPS information). We will process these data for the above mentioned purposes and to provide you with personalised information about your use of our Services.

The lawful basis for the processing of your data for these purposes is the legitimate interest of HCM 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).

#### **4.4. PROCESSING OF DATA FOR MARKETING PURPOSES FOR SIMILAR GOODS AND SERVICES**

We may use your personal data obtained directly from you and your registration to our Services for marketing of our own similar products and/or services (e.g. to notify you about new Services or other similar services of HCM), unless you have objected to such use.

The lawful 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.

#### **4.5.PROCESSING OF DATA FOR PURPOSES RELATING TO VEHICLE CYBERSECURITY**

Once you activate the Services, depending on the technical equipment of your vehicle, we collect and process data from your vehicle relating to security events in order to ensure that our vehicles and products meet the appropriate cybersecurity standards.

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 the 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 cybersecurity threats and vulnerabilities, responding to and eliminating detected threats and vulnerabilities arising from potential cybersecurity attacks, as well as ensuring that our vehicles and products have an appropriate level of security.

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

Your vehicle will periodically store the last 100 generated security events. If a new security event occurs, the oldest security event and the related data will be deleted. Further information about data retention can be found in Section 8 of this Privacy Notice.

#### **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 you deactivate the service so that none of your personal data can be accessed through the infotainment system (Settings – Bluelink/Genesis Connected Services – Deactivate Bluelink/Genesis Connected Services).

If you do not deactivate the Services, the data might still be accessible to 3rd parties through the infotainment system.

#### **6.WITH WHOM IS MY DATA SHARED?**

##### **6.1.Our sharing of your personal data**

Any access to your personal data at HCM 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/Genesis distributors – We will act as joint controller with the authorized Hyundai/Genesis distributor in your country of purchase regarding the following Services: Vehicle diagnostics (Section 4.2.4) and Product

improvement and development (Section 4.3) as well as in relation to the monitoring of our products and the product liability.

We will process your personal data in our role as technical and operational provider of the Services and transmit certain personal data to Hyundai/Genesis distributors.

The Hyundai/Genesis distributor receives your personal data for customer service and maintenance purposes as well as product development.

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

Further company details on each of the Hyundai/Genesis distributors can be taken from Section 14.

– Hyundai Motor Europe – We will act as joint controller with the Hyundai Motor Europe GmbH with its registered office in Kaiserleipromenade 5, 63067 Offenbach, Germany regarding vehicle system OTA updates.

We will process your personal data in our role as the technical and operational provider of the Services and transmit certain personal data to Hyundai Motor Europe.

Hyundai Motor Europe is responsible for the decisions related to and the monitoring of vehicle system OTA updates distribution.

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

– Other private third parties – We transmit your personal data to certain private entities that help us in offering the Services. For instance, we rely on telecommunication services.

– Data processors – We transmit your personal data to certain third parties, whether affiliated or unaffiliated, that process your data on behalf of HCM 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 the Services is: Hyundai AutoEver Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany.

– For Hyundai/Genesis Live 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 GmbH, Jülicher Straße 376, 52070 Aachen, Germany; Hyundai AutoEver Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany (e.g. for support and operating relevant applications).

– For the technical distribution of vehicle system OTA updates, analysis of security events and for assuring the technical processes related to data analysis for the purpose of product improvement and development, the data processor is Hyundai Motor Company, 12, Heolleung-ro, Seocho-gu, Seoul, Republic of Korea.

– We engage data processors for call centre services.

All above 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.

## **6.2. Sharing of personal data at your request**

We may also share your personal data with a third party at your request, including based on Art. 5 (1) of the EU Data Act or Art. 20 GDPR. To exercise this right, please refer to Section 9 (What rights do I have and how can I exercise them?) and to the Data Act Information Notice [<https://connected-mobility.hyundai.com/data-rights-en>] relating, in particular, to the use and sharing of the driving data.

## **7. IS MY DATA TRANSFERRED ABROAD?**

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

The European Commission has determined that South 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. 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 HCM's data protection officer (see Section 3 above).

## 8. HOW LONG WILL MY DATA BE STORED?

Your personal data is stored by HCM 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 we no longer need 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 we are subject; e.g. personal data contained in contracts, communications and business letters may be subject to statutory retention requirements, which may require retention of up to 10 years).

There are specific storage periods for the following items:

- Voice recognition: Voice samples and GPS coordinates (see Section 4.2.3 above) are stored up to 90 days.
- Hyundai/Genesis Live: Geolocation data (GPS coordinates) and service ID (see Section 4.2.2 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.

**Termination of account:** If you choose to terminate your account (e.g. by setting the relevant preference in the car's infotainment system), all personal data related to your account will be deleted, unless retention periods apply (see 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.

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 .

- **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.

- **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.

- **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.
- **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.
- **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.
- **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.

- **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 THE 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 functions are disabled and no personal data, in particular no geolocation data (GPS coordinates), is collected 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.

## **13. PROCESSING OF DATA OF AN AUTHORISED USER**

If you are an Authorised User, this Privacy Notice applies, subject to the considerations and limitations specified in this Section 13.

You are considered an Authorised User if you do not have your own title to the vehicle (i.e. ownership or lease), but use the Services based on the authorisation of another party conducting a business activity ("Business User"), in particular:

- your employer
- your business partner such as a car hire company.

### **13.1. Data controller & data sharing**

While Section 1 ("Who is responsible for processing my personal data?") applies, some of the data generated by the use of the vehicle data – including position data, trip data and routes, vehicle use and fuel/energy consumption, warranty information etc., depending on your relationship with the Business User and the settings the Business User

applies to the vehicle – is also available to the Business User who is a separate (independent) Data Controller of such data for the purposes defined by the Business User and agreed in the contract between us and the Business User.

The Business User is solely responsible for ensuring compliance with data protection laws, including the GDPR, in relation to personal data processed by the Business User.

### **13.2. Processing of personal data by Hyundai Connected Mobility**

If the Authorised User has not confirmed the Bluelink and OneApp Terms of Use as well as this Privacy Notice, Section 4 of this Privacy Notice applies to our processing of your personal data, with the following modifications:

1. Subject to point b) below, in relation to services described in Section 4.2, the lawful basis for our processing of personal data is our legitimate interest, consisting of the need to perform the contract with the Business User who owns or otherwise has the title to the vehicle as well as – where relevant also overall improving the user experience;
2. In relation to vehicle diagnostics services, the lawful basis for our processing of personal data is also our legal obligation (Art. 6 (1) c) GDPR) to monitor the products and to comply with product security requirements.

### **13.3. Processing of personal data by the Business User**

The Business User is obliged to provide you with information regarding the use of data, including personal data, in particular, the purposes, the lawful basis and the duration of the processing by the Business User.

Please contact the Business User in case of any questions related to this processing of data.

The above does not relieve us from the responsibility for compliance with the data protection laws in relation to the processing undertaken by us.

### **13.4. Rights of the Authorised User**

Your rights under the GDPR as a data subject remain unaffected. If you submit a request for data rectification, deletion or restriction, we may need to notify the Business User accordingly.

The lawful basis for this is either our statutory obligation (Art. 19 GDPR) or our legitimate interest, consisting of the need to perform the contract with the Business User who owns or otherwise has the title to the vehicle.

However, we are not responsible for the handling of data subjects' rights by the Business User.

## **14. APPENDIX: LIST OF AUTHORIZED HYUNDAI/GENESIS DISTRIBUTORS**

### **Austria**

Hyundai Import Gesellschaft m.b.H.  
Richard Strauss Straße 14  
1230 Vienna  
Austria  
Commercial register number: 47654f

### **Belgium**

NV Korean Motor Company SA  
Pierstraat 229  
2550 Kontich  
Belgium  
Commercial register number: BE0404273333

### **Bosnia and Herzegovina**

Hyundai-Auto BH d.o.o.  
Branilaca Šipa 4C  
71000 Sarajevo  
Bosnia and Herzegovina  
Commercial register number: 65-01-0799-09

### **Bulgaria**

Industrial Commerce Ltd

1797 Sofia  
260 Ring Road  
Bulgaria  
Commercial register number: 204502867

**Canary Islands**

HYUNDAI CANARIAS, S.L.U.  
C/ Lomo la Plana, 16  
35.019. Las Palmas de Gran Canaria  
Las Palmas  
Commercial register number: B76156504

**Croatia**

Hyundai Hrvatska d.o.o.  
Ljubljanskaavenija 4C  
10090 Jankomir  
Grad Zagreb  
Croatia  
Commercial register number: HRSR.080961241

**Cyprus**

CTC Automotive Ltd  
Shacolas Emporium Park-Annex 4, 4 Verginas Street  
2030 Nicosia  
Cyprus  
Commercial register number: HE145360

**Czech Republic**

Hyundai Motor Czech s.r.o.  
Siemensova 2717/4  
155 00 Praha 5  
Czech Republic  
Commercial register number: 28399757

**Denmark**

Hyundai Bil Import A/S  
Korsvej 1  
6000 Kolding  
Denmark  
Commercial register number: 14790993

**Finland**

Hyundai Motor Finland OY  
Kellokukantie 2  
01300 Vantaa  
Finland  
Commercial register number: FI16337337

**France**

Hyundai Motor France  
Tour Nova – 71 Boulevard National  
92250 La Garenne-Colombes  
France  
Commercial register number: 411 394 893

**Germany (Hyundai)**

Hyundai Motor Deutschland GmbH  
Kaiserleipromenade 5  
63067 Offenbach  
Germany  
Commercial register number: HRB 47293

**Germany (Genesis)**

Genesis Motor Deutschland GmbH  
Strahlenbergerstraße 110-112  
63067 Offenbach am Main

**Greece**

HyundaiHellas S.A.  
31, Viltanioti Street  
14564 Kifissia  
Greece  
Commercial register number: 659601000

**Hungary**

Hyundai Holding Hungary Kft  
Cziffra György út 15  
1182 Budapest  
Hungary  
Commercial register number: 01-09-881438

**Iceland**

BL ehf  
Kauptúni 1  
210 Garðabær  
Iceland  
Commercial register number: 630211-0500

**Ireland**

Hyundai Cars Ireland Limited  
JFK Drive, Naas Road  
Dublin, 12  
Ireland  
Commercial register number: 211878

**Italy**

Hyundai Motor Company Italy S.r.l.  
Via Giovanni Bensi 11  
20152, Milano  
Italy  
Commercial register number: MI-1883965

**Malta**

Meridian Enterprises Co. Ltd.  
Pater House  
168 Psaila Street  
Birkirkara BKR 9077  
Malta  
Commercial register number: C3988

**Moldova**

Pacific Motors SRL  
Chisinau str. Calea Mosilor 5/1  
Moldova  
Commercial register number: 1014600041393

**The Netherlands**

Hyundai Motor Netherlands b.v.  
Hub van Doorneweg 14  
2171 KZ Sassenheim  
The Netherlands  
Commercial register number: 61506230

**Norway**

Hyundai Motor Norway AS  
Alf Bjerckes vei 8  
0582 Oslo  
Norway  
Commercial register number: 914 315 816

**Poland**

Hyundai Motor Poland Sp. Z o.o.  
ul. Woloska 24  
02-675 Warszawa  
Poland  
Commercial register number: 0000067315

**Romania**

Hyundai Auto Romania  
Bd. Expozitiei, nr. 2, showroom Hyundai  
etaj 1, sector 1, Bucuresti  
Romania  
Commercial register number: J40/15805/1994

**Serbia**

Hyundai Srbija d.o.o. Beograd  
Milutina Milankovića 7V  
11070 Novi Beograd  
Serbia  
Commercial register number: 21114804

**Slovakia**

Hyundai Motor Czech s.r.o.,organizačná zložka Slovaki  
Galvaniho 17/A  
821 04 Bratislava  
Slovak Republic  
Commercial register number: 1610/B

**Slovenia**

Hyundai Avto Trade d.o.o. Ljubljana  
Brnčičeva 45  
1231 Ljubljana – Črnuče  
Slovenia  
Commercial register number: 5526485

**Spain**

Hyundai Motor España S.L.U.  
Calle Quintanapalla 2  
28050 Madrid  
Spain  
Commercial register number: B85754646

**Sweden**

Hyundai Motor Sweden AB  
Hyllie Stationsväg 42  
215 32 Malmö  
Sweden  
Commercial register number: 559441-2529

**Switzerland (Hyundai)**

ASTARA MOBILITYSWITZERLAND AG  
Brandbachstrasse 6  
CH-8305 Dietlikon

Switzerland  
Commercial register number: CHE-262.166.165

**Switzerland (Genesis)**

Genesis Motor Schweiz AG  
Bahnhofstrasse 6  
8001 Zurich  
Switzerland

**UK (Hyundai)**

Hyundai Motor UK Limited  
Ground Floor, Birchwood Building Springfield Drive  
Leatherhead Surrey KT22 7LP  
United Kingdom  
Commercial register number: 05446560

**UK (Genesis)**

Genesis Motor UK Ltd  
Birchwood Building, Springfield Drive, Leatherhead, Surrey, United Kingdom  
KT22 7LP  
United Kingdom

**Ukraine**

Hyundai Motor Ukraine LLC  
1A Novokonstantynivska Str.,  
04080 Kyiv  
Ukraine  
Commercial register number: 33261252