

HYUNDAI CONNECTED MOBILITY GMBH

PRIVACY NOTICE – HYUNDAI IN-CAR PAYMENT

Effective from: 19 May 2025

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

<https://www.hyundai.com/eu/in-car-payment-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 Hyundai In-Car Payment service and is addressed to our customers using In-Car Payment via the car’s infotainment system (this is the head unit of your vehicle) and the myHyundai 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 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 Service 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.

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

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

Alternatively, you may also contact our data protection officer at HCM.dataprotection@hyundai-europe.com, or by writing to:

Hyundai Connected Mobility GmbH
c/o Data Protection Officer
Kaiserleipromenade 5
63067 Offenbach, Germany

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

3.1. OUR PROCESSING OF YOUR PERSONAL DATA

3.1.1. PROVISION OF HYUNDAI IN-CAR PAYMENT

In-Car Payment (the “Service”) is offered via your vehicle’s head unit and is also integrated in the myHyundai App. To use In-Car Payment, you must first register for the Service. This can be done within your myHyundai App.

3.1.1.1. REGISTERING FOR IN-CAR PAYMENT

Before you can use In-Car Payment, you must register for the Service within the myHyundai App.

During registration, you will be asked to accept the In-Car Payment Terms of Use and to acknowledge this Privacy Notice.

To enhance the security of in-car purchases, users can enable an additional layer of protection by setting a personal identification number (PIN). When this feature is activated, the PIN must be entered in the vehicle's interface prior to completing any purchase transaction.

By default, the PIN verification feature is disabled.

After the initial registration steps, you must complete the following steps.

a) Linking a vehicle to In-Car Payment

You must select the vehicle in which you want to use the In-Car Payment account for which you just registered. During the vehicle linking process, you will be asked to enter the vehicle's license plate number and country of registration.

b) Selecting a payment method from Hyundai Pay

In-Car Payment uses our digital wallet Hyundai Pay. You must register and enroll your payment card to the Hyundai Pay wallet to make payments via In-Car Payment.

If you register for In-Car Payment without having registered for Hyundai Pay, you will be guided through the registration process for Hyundai Pay service as well, to enroll your payment card.

If you already are a registered user of Hyundai Pay and have enrolled your payment card, you will be prompted to select the card for In-Car Payment.

User must perform Strong Customer Authentication (SCA) facing a 3DS challenge. During this process, the customer's card details (PAN), expiry date and CVV are shared with the merchant. This process generates Network Token ID (NTID), which identifies your card in future payments to selected merchants.

Registration and use of Hyundai Pay is governed by the Hyundai Pay Terms of Use and Hyundai Pay Privacy Notice.

For this purpose, the following categories of personal data are processed: the vehicle's license plate number and country of registration; the PIN you chose; the selected payment method in Hyundai Pay, the merchants you selected for use with In-Car Payment; your acceptance of the In-Car Payment Terms of Use and acknowledgement of the In-Car Payment Privacy Notice.

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 In-Car Payment.

c) Selecting and enabling cooperating merchants for use with In-Car Payment

In-Car Payment allows you to purchase goods and services from merchants which cooperate with Hyundai to make their goods and services available via In-Car Payment (such as car park operators or their service providers, toll service providers etc.).

As the goods and services are provided under direct contracts between you and the merchant, it is up to you to choose which merchants you want to use with In-Car Payment.

When enabling the use of a cooperating merchant, you must accept the respective merchant's terms of use and acknowledgement of the merchant's privacy notice.

For this purpose, the following categories of personal data are processed: your acceptance of the respective merchant's terms of use and acknowledgement of the merchant's privacy notice.

The processing is necessary for the conclusion and performance of the contract that you enter into with the respective merchant when purchasing any of the merchant's products using In-Car Payment (Art. 6 (1) b) GDPR).

3.1.1.2.Using In-Car Payment

When you use In-Car Payment, Hyundai processes and in particular stores the details of the purchases you make as well as information on past purchases made as provided by the merchant in order to display an order history.

In order for the merchant to initiate payment, known as Merchant Initiated Transaction (MIT), using the payment method you selected in Hyundai Pay, the token of the selected payment method will be transmitted to the merchant and then to the merchant's payment service provider for payment processing.

The data processed (and transmitted to the merchant) depends on the goods or service you purchase.

For this purpose, the following categories of personal data are processed: When you initiate a purchase with a merchant, the data processed depends on the specific product or service you purchase using In-Car Payment.

If you purchase parking services, we will process (and transmit to the merchant) the following data: location of the car park, your license plate number and country of registration, parking start time and parking end time (in case of payment on departure) or parking duration selected (in case of payment on arrival).

Please see the merchant's terms of use for details on the data processed by the merchant for the provision of the respective goods and services.

In any case we will process and transfer to the merchant the token of the selected payment method.

In order to provide you with your purchase history, we process information on the goods/services purchased (such as car park location, the purchase price and the date of purchase).

The processing of the order information is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) for the provision of In-Car Payment.

Transmission of the data on the products/services purchased and the payment token to the merchant is necessary for performance of the contract that you enter into with the respective merchant when purchasing any of the merchant's products using In-Car Payment (Art. 6 (1) b) GDPR).

3.1.2.PROCESSING FOR OTHER PURPOSES

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

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

When you contact us via the available communication channels, we may process your personal data to handle your request and to communicate with you accordingly about your request.

For this purpose, the following categories of personal data are processed: Contact details (e.g. email address and telephone number), name, information provided by you in relation to the relevant request, as well as – where relevant – information about your vehicle and the 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.

3.1.2.2.Surveys and feedback:

From time to time, we may invite you to provide your feedback and/or participate in surveys relating to 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 third-party providers to conduct such surveys.

For this purpose, the following categories of personal data are processed: Name (if relevant and provided), content data (e.g. your feedback and/or responses), technical data (IP address, UUID, operating system version, device type, device ID/MAC address, system, performance information and 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.

3.1.3.NO AUTOMATED DECISION-MAKING

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

3.1.4.PROCESSING OF DATA FOR MARKETING PURPOSES FOR SIMILAR GOODS AND SERVICES

We may use your personal data obtained directly from you and your registration for our Service for marketing of 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 3.1.

4.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 the data for the specified purposes:

a) Merchants: We may disclose such personal data you provided in the context of In-Car Payment to the respective merchant from which you purchased (or intend to purchase) goods or services via In-Car Payment.

The merchants may transmit the data to further recipients (such as their payment services providers). Please see the respective merchant's privacy notice for more detailed information.

For a list of merchants currently offering their services for purchase via In-Car Payment, please see the "Merchants" annex.

b) Other recipients:

Members of Hyundai Group

- BlueWalnut Co. Ltd, Hyundai affiliate, which provides the overall IT infrastructure and services enabling In-Car Payment operations, in its capacity of data processor;
- Hyundai Autoever Europe GmbH, which provides IT support in its capacity of data processor.

Other partners involved in the provision of Hyundai In-Car Payment

- Financial services partner, payment services partners and providers of payment gateway services, for the purpose of enabling the proper functioning of the platform's payment system and payment services;
- Third-party managed contact centre and chat services;
- Third parties such as market research companies, marketing agencies and lead generation companies and well as other third parties that provide us with personal data.

b) Governmental authorities and other similar third parties that are public bodies:

1. Tax authorities, law enforcement agencies, courts and tribunals, as appropriate, based on compliance with legal obligations related to civil, penal, tax or administrative law.

5.IS MY DATA TRANSFERRED ABROAD?

In principle, your data related to Hyundai In-Car Payment is processed in the EU / EEA.

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

The European Commission has determined that the Republic of Korea and the United Kingdom 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), where the data protection laws may provide a different level of protection compared with 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 measures we have taken is available from Hyundai's data protection officer (see Section 2 above).

6.HOW LONG WILL MY DATA BE STORED FOR?

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 periods, which may require retention of up to 10 years).

If you choose to terminate your Hyundai In-Car Payment via the myHyundai application, all your personal data related to Hyundai In-Car Payment will be deleted, unless specific retention periods apply.

7.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.

7.1. 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.

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

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

7.2. 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.

7.3. 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.

7.4. 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.

7.5. You have the right, without hindrance from us, to transfer this data or have it transferred directly by us to another entity.

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

7.6. 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.

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

8. AM I OBLIGED TO PROVIDE MY DATA?

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

However, if you do not provide your personal data specified in Section 3.1.1, you will be unable to use the Service.

9. 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.

Annex: Merchants

Recipient	Business purpose	Transfer mechanism
Parkopedia Limited 232 Sladepool Farm Road Birmingham, West Midlands B14 5EE United Kingdom	Provision of purchased (or intend to purchase) goods or services via In-Car Payment, including transmission of data to further recipients (such as their respective payment processors)	Adequacy decision per Art. 45 GDPR