

Test Drive Privacy Policy

This policy is provided by Toyota Connected Europe Limited (“TCEU”, “we”, or “us”), 10th Floor, 14-18 Handyside St, Kings Cross, London N1C 4DN.

TCEU is a Data Controller for your data in respect of the purposes described in this policy, except where otherwise indicated. Our Data Protection Officer can be contacted by sending an email to Privacy@toyotaconnected.eu

TCEU is a data sharing partner with the Toyota group member Toyota GB - <https://www.toyota.co.uk/footer/privacy-policy>

This Policy relates to your Test Drive products only.

What does TCEU do?

Test Drive = information about the journey you take when you test drive a vehicle.

Toyota Connected Europe is a data company. We are collecting your data to help you understand information about your Test Drive. For example, understanding what percentage of your journey used electricity and fuel, as well comparisons between your existing car and the Test Drive Car.

Describing the data collection for Test Drive

Test Drive Customers (“Customers”)

1. You will be asked to give consent to the processing of your data for the purposes as described in the table below, including analysing your journey, showing you your journey, and using your analysed journey to support any sales process. You will be giving your consent to both TCEU and Union Motors Israel. Additionally, if you have provided your email address to send you a copy of your analysed journey, this will be sent on behalf of both TCEU and Union Motors Israel.
2. We connect a device to the car (if you have given your consent), which will capture data during your journey.
3. After the journey ends, we will analyse the data you have provided about your existing car, with the details of your journey, to show you information about the Test Drive, including how this compares to your existing car.
4. We will then display this on the screen of the sales executive for you to view.
5. Your name and contact details get deleted after 90 days, or sooner if you withdraw your consent. With your permission, we retain the journey data after 90 days, removing your name and contact details, to help us improve our products.
6. We also use this data, after deleting your name and contact details, at an aggregated level to provide statistics across the Toyota Group as well as with external parties including governments. We call this pseudonymised data, where we can no longer attribute this data to you without the use of additional information, which is kept separately and is subject to technical and organisational measures.

Toyota Dealer Employees (“Employees”)

1. The collection of your personal data when you use the web portal that enable Customers to benefit from Test Drive (**“Web Portal”**), in your role as an employee of the Toyota dealer will be covered as part of your Employee Privacy Notice with your employer. The Web Portal that is used in the performance of your duties, are at the discretion of your employer. TCEU will be acting as a Processor, processing your data, on behalf of your employer either entered directly by you or by your employer.

2. Your employer will set up an account on the system for you.
3. Agreement to Terms and Conditions of our Web Portal are provided to us by your employer.
4. Agreement to our cookies (where consent is required) is by you and or your employer, and for the sole purposes of TCEU. TCEU is acting as an independent Controller of your data for the setting of both essential and non-essential cookies and use of data collected via cookies. Your employer can prevent the setting of these cookies by setting up default rejections of our cookies on your devices, or you can also refuse the cookies.

Where we collect your data from?

For Customers:

1. From you, when you consent to providing your details for the information service that will be gathered as part of your test at the point you take your Test Drive.
2. The car you are test driving, during the period of your Test Drive only.
3. Third party look up services, such as a government look up service which allows us to extract details about your existing car, to enable us to make comparisons.
4. Third party Toyota Group Member, who provide us with licence plate, make and model of the vehicle you are test driving.

For Toyota Dealer Employees:

1. From you or your employer, when you use our Web Portal.

Categories of Data

Contact details (Customers and Employees)

First name, surname, email address, telephone number, collected and submitted via the Web Portal.

Existing car details (Customers only)

We can, as part of offering information about your Test Drive, make comparisons with your existing car. We do this by asking you for information such as estimated miles per gallon, or by taking your registration number, and looking up the technical details from a third-party supplier.

Technical details collected from or information submitted by using our website portal (Employees only)

Technical data, such as your IP address, your internet browser, the pages you have visited on this website portal, and relation about your movements and clicks within our website portal, including information relating to your session and device information (for example hardware model, operating system, version and mobile network information).

Connected Car Data (Customers and Employees)

- ***Telematic Data*** – data related to the car, rather than the driver, for example, fuel level, warning lights, tyre pressure, brake fluid level, Vehicle Identification Number, IMEI, MSISDN, SIM Card ID, Licence plate, make and model of the vehicle.
- ***Driver behavioural data*** – data relating to actions initiated by you, the driver. For example, how much fuel you have consumed, how many times you accelerated, when and you used the brakes, your speed, how much and how often your vehicle used electrics rather than fuel.
- ***Geo Data*** – data relating to your location when you drive your car. This is precise points, including the longitude and latitude of your vehicle, direction of travel, including the precise time. Generally, we will receive data points at 10 second intervals during your

Test Drive. However, it can be less frequent depending on your actual journey, such as driving on long straight roads may mean we collect data less frequently.

- Analytics and profiles, including scoring to help you understand how you drive your vehicle, and how economical it was, derived or inferred data.

Who we share your data with?

Your personal data will be shared with:

- Toyota GB <https://www.toyota.co.uk/footer/privacy-policy>

And may be shared with the following parties on a case by case basis as below (see table below)

- legal advisors, auditors and other professional advisors;
- courts, tribunals, arbitrators or other judicial committees; and
- local or foreign governments, regulators and law enforcement agencies.

When third parties are given access to your personal data, we will take the required contractual, technical and organizational measures to ensure that your personal data is only processed to the extent necessary.

We also use service providers to help deliver its services. These providers, known as Processors, can only process your data on our behalf. The main Processors that we use are:

- Microsoft Azure – Netherlands – Hosting and infrastructure;
- Amazon Web Services – Germany – Hosting and infrastructure, certified with the ISO27001 Information Security Management System https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf;
- Toyota Motors North America – America – Administration and support;
- Mailgun - for sending you a copy of your Test Drive journey;
- BDB – India – Business support and product development;
- Teltonika – the provider of the device in the car that collects the data from the car and submits this to TCEU; and
- Mobile operator – for carrying the data from the car to our systems.

The Purposes, Retention, and Lawful Basis

Lawful Basis	Purpose	Categories of Data (some or all of each category mentioned)	Retention Period	Who your data is shared with
Consent	Analyse Test Drive information for the purposes of helping you decide on future purchases of a hybrid car.	Connected car data Customer Existing car details	90 days from the data of your Test Drive	Toyota GB https://www.toyota.co.uk/footer/privacy-policy
Consent We pseudonymise	Product research and development to help us improve	Connected car data	1 year	TCEU only

the data before using it for this purpose (we remove your contact details)	our digital platforms			
Consent (we remove your contact details)	Analytics to inform insights and marketing	Connected car data	1 year (after 1 year the data is kept anonymised)	Toyota GB
Consent Cookies and similar technologies (Employee only)	Analytics – Web Portal	Technical details from use of our websites and or apps	13 months, or until you withdraw consent	TCEU is a Joint Controller with Google - https://policies.google.com/privacy?hl=en-US Hotjar https://www.hotjar.com/legal/policies/privacy/
Legal Obligation GDPR Article 7 (1)	Consent records, evidence of when and how you gave consent	Your name, email address and date you consented to receive a copy of your Test Drive information, as well as the dealer in which you gave your Consent	3 years	Union Motors Israel
Legal Obligation GDPR Article 32	To implement security measures to protect the data, including essential cookies used for security via our web portal	Technical details from use of our websites and or apps Employee contact details	Minimum 12 months	Will be decided on a case by case basis, when circumstances arise that cause the sharing of data to prevent or detect abnormal activity. In the event that it is necessary to share the data, TCEU will decide on the most appropriate basis for sharing, which will normally be legitimate interests or legal obligation

Vital Interests	Where we are faced with a decision to process your data, including sharing it protect your vital interests or that of another person	Any or all of the data that is being processed.	On a case by case basis	Decided on a case by case basis. For example, if during your Test Drive, you are involved in an accident, and we need to contact police/emergency services.
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Anonymised Statistics

We will, where you have given your consent share anonymous aggregated statistics throughout the Toyota Group, as well as any third parties upon request.

Withdrawing consent

If you withdraw your Consent, we will keep minimal details about when you gave Consent and when you withdrew your Consent.

1. Test Drive Information

Please email privacy@toyotaconnected.eu and we will delete your data.

2. Cookies and Similar Technologies – Web Portal

Please email privacy@toyotaconnected.eu and we will delete your data, plus you will also need to remove our cookies as detailed in our Cookie Policy <https://toyotaconnected.eu/privacy-policy/products/>

Using and analysing your data – “Profiling”

The analysis we do about your Test Drive, will be used to provide you with information about the efficiency of your Test Drive journey, using your driver behaviour, as well as technical points in the car. As part of providing these statistics, we build a profile about your use of the vehicle, for example, using speed, brakes, acceleration.

When using the Web Portal as an employee, and if you have provided your consent, we will analyse your use, to help us understand how you have used our web portal to help us improve this portal for use by companies and their employees.

Security measures

Whilst we take all reasonable precautions to protect personal data from loss, misuse, alteration or destruction and complies with data protection laws, data transmission over the internet may not be adequately secured by the sender. As a result, TCEU cannot ensure the secure receipt of any information that is sent to TCEU by this medium and any such information is sent at your own risk.

Special Category Data

We do not intentionally process special category sensitive data, such as health, political or religious beliefs, and we do not knowingly attempt to identify, predict, evaluate or in any way process data that would indicate any of the above. Whilst it may be possible to make inferences about any of the above from data collected, TCEU does not make those inferences.

Children's Data

We do not process children's data.

Where is your data processed?

We may transfer your personal data to countries or territories outside your place of residence, where data protection laws may not offer the same level of protection available in your home country. We will implement appropriate measures to ensure that your personal data remains protected and secure when it is transferred outside of your home country, in accordance with applicable data protection and privacy laws. These measures include data transfer agreements implementing standard data protection clauses. You can find more information about data transfer agreements [here](#).

Your rights with respect to your personal data

You may, depending on your location, have the following rights:

- receive confirmation from us as to whether we process your personal data, and, where we do, access a copy of that personal data and certain other information;
- request the rectification of any inaccurate personal data that we hold about you;
- request the erasure of your personal data in certain circumstances;
- request the restriction of our processing of your personal data in certain other circumstances, for example in certain scenarios where we are unable to comply with a request to erase your personal data;
- receive a copy of the personal data that you have provided to us in a structured, machine-readable and commonly used format and/or, where possible, to request we transmit that personal data to another organization;
- object to certain processing of your personal data;
- withdraw your consent to the processing of your personal data (where we are processing your personal data based on your consent); and
- make a complaint about our handling of your personal data to your local data protection supervisory authority (details of local supervisory authorities in each EU Member State can be found [here](#)). For the United Kingdom Commissioners Office - **0303 123 1113**.

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