

**PRIVACY NOTICE**  
**FOR THE PROCESSING OF YOUR PERSONAL DATA IN THE FRAMEWORK OF**  
**THE TOYOTA CONNECTED SERVICES**

At Toyota we strive to honour the language and spirit of the law, and to undertake open and fair business activities to be a strong corporate citizen. We are convinced that, in order to build a trusted relationship with our customers and to provide reliable connected car services, it is essential for us to protect your personal data and to be open about the way we handle your personal data.

This Privacy Notice explains how we will handle your personal data (“**Personal Data**”) when providing the connected car services you can subscribe to through your MyToyota account and access through the MyToyota App and Portal (collectively the “**Services**”).

You should read this Privacy Notice together with the **General Toyota Privacy and Personal Data Protection Policy** (the “**General Privacy Policy**”) [\[Link to the policy to be embedded\]](#) in which we describe in general terms how we collect your Personal Data and why we collect it, what we do with your Personal Data, with whom we share it, how we protect it, and the choices you can make about your Personal Data.

**Who is responsible for the collection and use of your Personal Data?**

The following entity is responsible for the collection and use of your Personal Data:

Toyota Motor Europe SA/NV  
Avenue du Bourget/Bourgetlaan 60  
1140 Brussels  
Belgium

In partnership with:

Toyota Connected Europe Limited  
10<sup>th</sup> Floor, 14-18 Handyside Street  
London N1C 4DN  
United Kingdom

Toyota Motor Europe and Toyota Connected Europe Limited are hereafter collectively referred to as “**Toyota**”, “**we**”, “**our**” or “**us**”.

**Why do we collect and use your Personal Data?**

We collect and use your Personal Data for the following purposes:

- To activate or deactivate your subscription to the Services;
- To provide the Services to you;
- To handle your queries;

- To support our sales and marketing activities;
- To conduct research and development (e.g. by means of data analytics) to enhance and improve the Services, to develop new mobility and/or connected car services and solutions and to improve the performance of the Toyota vehicles, products and services or develop new ones;
- To secure, maintain and support our networks, systems and applications;
- If reasonably necessary in connection with a dispute in which we are or may become involved either directly with you or with a third party;
- To assess whether your vehicle (or parts thereof) is still under warranty;
- To create leads (e.g. try before you buy) for the usage-based insurance (UBI) service;
- When we are required by law enforcement authorities or courts to disclose your Personal Data;
- To improve our services (eg. if there is a technical problem with your Toyota vehicle we may use your Personal Data (eg. your driving data) to try and solve that problem).

We will share your Personal Data with others for the following purposes:

- If you have a Toyota vehicle with on-board Internet access functionality, the Electronic Communications Service (“**ECS Provider**”) that will provide the Internet access service may be under a legal obligation to obtain certain identification information relating to you. Toyota will collect that identification information from you and provide that information to the ECS Provider;
- To enable our network (national distributors and Authorised Retailers/Repairers) to contact you in the framework of the provision / implementation of certain Services;
- Where we are required by public authorities (e.g. law enforcement authorities) and courts to disclose your Personal Data to them;
- If reasonably necessary in connection with a dispute in which we are or may become involved, we may share your Personal Data with, for example, the other part(y)(ies) involved in the dispute or with a court of law;
- If you have a usage-based insurance contract with a partner of Toyota Insurance Management (TIM), we will share with the insurer the Personal Data that is necessary for the insurer to implement such contract and provide insurance coverage (e.g. the geolocation information linked to your Toyota vehicle, your driving behaviour, etc.).
- If you have an usage-based insurance contract with an insurer that does not belong to the Toyota group of companies and that is not a partner of Toyota Insurance Management (TIM), we will only share your Personal Data with such third party insurer upon your prior consent;
- We may share your Personal Data with third party providers of value added services if you have provided your prior consent thereto;
- We use external service providers in connection with the development, marketing and provision of the Services. These service providers may in certain circumstances obtain access to your Personal Data when providing services to Toyota;
- We may anonymise your Personal Data and share these anonymous data with third parties for legitimate purposes such as for developing new mobility services and solutions.

### **Whose Personal Data will be processed?**

You, being the person who has subscribed to the Services in accordance with our terms of use.

Please note that, if you allow another person to drive / use your Toyota vehicle, you have the responsibility to communicate this Privacy Notice to that driver / user, in order to inform that driver / user of the processing of his/her Personal Data in the context of the Services.

Prior to transferring the ownership of your Toyota vehicle to another person or to a reseller, you must:

- Remove, to the extent technically possible, all data and content (including any Personal Data), if any, that you have stored on your Toyota vehicle and that is accessible from your MyToyota account; and
- Remove the Toyota vehicle from your MyToyota account.

### **Which Personal Data will be collected?**

We will collect and use the following Personal Data:

- Identity information (e.g. title, family and first name, mother tongue);
- Contact information (e.g. mobile number, email address, postal address);
- If you have a Toyota vehicle with an on-board Internet connectivity functionality, identification information requested by the ECS Provider which provides the Internet access service (e.g. copy of ID documents, debit/credit card details);
- MyToyota account related information (e.g. preferred contact method, subscription information, communication language preference, Authorised Retailer/Repairer preference);
- Geolocation information linked to your Toyota vehicle and/or your smartphone (e.g. geolocation of your vehicle (longitude and latitude), planned destination);
- Driving behaviour (e.g. driving logs, journey logs, driving speed, acceleration and brake speed);
- Emergency contact information (if you have provided such information on your MyToyota account);
- Journey information;
- We may use your social media ID to allow you to share the location of your Toyota vehicle with others (e.g. with respect to those Services which allow you to share the location of your Toyota vehicle with others via social media of your choice);
- Customer segment;
- Vehicle identification data (e.g. vehicle registration plate, vehicle identification number, date of purchase of the vehicle);
- Technical vehicle data (e.g. mileage, fuel consumption, warnings) and diagnostic data;
- Current and historical vehicle-related data (e.g. accessories, tyres, finance, insurance, warranty-related information, if applicable);
- Data relating to invoices and payments for the Services (e.g. history of your payments for the Services, invoices, VAT number, if applicable); and
- Interaction history (e.g. planned maintenance and service bookings).

### **What are the legal bases for Toyota's use of your Personal Data?**

#### *1. Necessary for the performance of our contract with you*

We generally process your Personal Data as this is necessary for us to perform the contract through which you have subscribed to the Services.

#### *2. Our legitimate interests*

Where applicable, we process your Personal Data if this is necessary to pursue our legitimate interests in relation to the provision of the Services, provided that our interests are not outbalanced by your interests or rights and freedoms (e.g. your privacy rights). For example, we process Personal Data:

- To allow our Toyota network partners (e.g. national distributors, Authorised Retailers/Repairers) to contact you in the framework of maintenance reminders and crash management;

- Where applicable, to allow you to share certain data with others (e.g. your location, the location of your Toyota vehicle, your destination, your estimated time of arrival);
- To allow us to contact an emergency contact person that you have designated and who must be contacted in case you and/or your Toyota vehicle is involved in a crash;
- In case you have a Toyota vehicle with an on-board Internet connectivity functionality, to allow external providers (e.g. the ECS Providers that provide the Internet Access Service) to fulfil their legal obligation to identify you (by collecting your identification information);
- To conduct research and development to enhance and improve the Services, to develop new mobility solutions and to improve the performance of Toyota vehicles, products and services; in that context, we may process your Personal Data in a form that cannot be traced directly back to you;
- To improve our services (eg. if there is a technical problem with your Toyota vehicle we may use your Personal Data (eg. your driving data) to try and solve that problem); and
- To disclose your Personal Data when we are required to do so by law enforcement authorities or the courts.

### *3. Our legal obligations*

We process your Personal Data if this is necessary for us to comply with our legal obligations, including to comply with decisions rendered by courts or public authorities. For example, if we have charged you for your use of the Internet access service, we may be obliged to retain the invoice (and your Personal Data on the invoice) for a legally prescribed period of time.

### *4. Based on your consent*

In certain instances we will only process your Personal Data if you have given your prior consent. For example, we need your prior consent to use your Personal Data to create leads (e.g. try before you buy) for the usage-based insurance (UBI) service or to share your Personal Data with third party providers of value added services.

### **How can I suspend the use of my Toyota vehicle's geolocation?**

If you do not want your Toyota vehicle's geolocation data to be used, you can at any time activate the "privacy mode" through your MyToyota account. If the "privacy mode" is active, we will cease to use such geolocation data.

Please note that, once activated, the privacy mode will apply to all Services relying on geolocation, except for usage-based insurance if a usage-based insurance contract is concluded for your vehicle. Many Services rely (wholly or partly) on the geolocation data from your Toyota vehicle. Therefore, when the "privacy mode" is active, these Services may be unavailable or their quality and accuracy may be affected. For example, if you have activated the "privacy mode", you will not be able to use the Service allowing you to locate your Toyota vehicle and we will not be able to locate your Toyota vehicle after a crash notification. However, if a usage-based insurance contract is concluded for your vehicle and if you activate the privacy mode, your Toyota vehicle's geolocation data will continue to be used but only for the purpose of the usage-based insurance contract.

The status of the "privacy mode" (active or inactive) remains as you have set it until you decide to change the status. You can check the current status of the "privacy mode" through your MyToyota account.

### **How long will Toyota keep my Personal Data?**

We keep your Personal Data for no longer than is necessary for the purposes for which they are processed.

#### *1. Personal Data relating to the use of your vehicle*

Personal Data relating to the use of your vehicle (eg. geolocation information linked to your Toyota vehicle (e.g. longitude and latitude, planned destination); driving behaviour (e.g. driving logs, journey logs, driving speed, acceleration and brake speed); journey information) is kept for 12 months. That period may be shorter:

- If your subscription to the Services terminates or expires earlier;
- If you sell your Toyota vehicle and if the new owner subscribes to the Services for the same vehicle. In that case we will delete all Personal Data relating to your use of that vehicle when the new owner activates his/her subscription.

#### *2. Other Personal Data*

We use the following criteria to set the periods during which we will keep your other Personal Data (ie. other than Personal Data relating to the use of your vehicle):

- Duration of your subscription to and provision of the Services;
- Our legal obligations to retain certain of your Personal Data;
- Periods during which a claim can be initiated by or against us;
- Necessity for us to conduct audits (e.g. security audits);
- Necessity to use your Personal Data in the framework of any current or potential disputes.

After termination or expiry of your subscription to the Services, we will either delete your Personal Data relating to your use of the Services or keep such Personal Data in a form that cannot be traced directly back to you.

#### **Will my Personal Data be transferred to other countries?**

Toyota operates globally. Therefore, your Personal Data may be stored and processed by us or our service providers in multiple countries, including countries other than your country of residence or purchase of your Toyota vehicle. Your Personal Data may, for example, be transferred to the United Kingdom, Japan and/or the United States.

If your Personal Data is being transferred to countries located outside of the European Economic Area (“EEA”), we will ensure that appropriate safeguards are taken, such as:

- The transfer falls within the scope of an adequacy decision taken by the European Commission under Article 45 of the GDPR;
- Standard data protection contractual clauses, as approved by the European Commission or a data protection authority pursuant to Article 46.2(c) or (d) of the GDPR, have been established; or
- In case of a transfer of your Personal Data to the United States, such transfer is governed by the EU-US Privacy Shield under Article 45 of the GDPR.

For further information about how transfers of personal data outside of the EEA are regulated, please consult the following link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en).

For further information on how we implemented the appropriate safeguards, you can contact us as specified in the section “How can I exercise my privacy rights and contact Toyota?” below.

## What are my rights in relation to my Personal Data?

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data that we hold about you in the context of the Services. These rights include the following:

- The right to be informed: You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data and your rights related thereto. This is in part why we are providing you with the information in this Privacy Notice.
- The right of access: You have the right to obtain access to your Personal Data. You may wish to access your Personal Data to confirm our use in accordance with applicable data protection laws.
- The right to rectification: You are entitled to have your Personal Data rectified if they are inaccurate or incomplete.
- The right to erasure: This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your Personal Data where there is no compelling reason for us to keep using it. Please note that this is not an absolute right and exceptions apply.
- The right to restrict processing: You have rights to block or prevent further use of your Personal Data. When processing is restricted, we can still store your Personal Data, but our use of your Personal Data will be restricted.
- The right to data portability: You have the right to obtain and reuse your Personal Data for your own purposes across different services. For example, if your relationship with Toyota ends, this right enables you to move, copy or transfer your Personal Data easily between our IT systems and those of another service provider, without affecting its usability. Please note that this is not an absolute right and exceptions apply. Also, this right can be applied only in certain circumstances and provided it does not adversely affect others' rights (for example, it can be applied with regard to the Personal Data you provided to us, which we processed in order to fulfil our contract with you).
- The right to object to processing: Where the processing is based on our legitimate interest, you have the right to object to such processing unless we have a compelling and legitimate reason to continue processing your Personal Data.
- The right to object at any time to the processing of your Personal Data for direct marketing purposes.
- The right to lodge a complaint: You have the right to lodge a complaint about the way we handle or process your Personal Data with your national data protection authority. In your country that is **[NMSC to fill in the name and URL of the national data protection authority of its country]**.
- The right not to be subject to automated-decision making: You have the right not to be subject to a decision that is based solely on automated processing (including profiling) and that produces legal effects for you or similarly significantly affects you.

Please note that you may exercise the abovementioned rights only in relation to the Personal Data we hold about you in the context of the Services.

## How can I exercise my privacy rights and contact Toyota?

For more information about our use of your Personal Data and to exercise your privacy rights, please contact us as follows:

- you can exercise your right of access, right to data portability, right to erasure and right to object, by clicking on the relevant links on your MyToyota account;
- you can directly rectify your account-related Personal Data through your MyToyota account; and

- for any other request, please [send an email to [\[NMSC's DP Contact Point email address\]](#) or click [here \[hyperlink that leads to NMSC's DP Contact Point email address\]](#)

We will try to comply with your requests as soon as reasonably practicable and always in accordance with the legally prescribed timeframes. Please note that, if we have doubts about your identity, we may require you to provide us a proof of your identity to, for example, prevent unauthorised access to your Personal Data.

Please note that, if you have requested the erasure of your Personal Data, we may still have to retain certain Personal Data if so required or authorised by law.

### **Changes to this Privacy Notice**

Toyota may update this Privacy Notice from time to time, and when we do so, we will re-issue a revised Privacy Notice, and notify you of any changes to the extent required by law.

If you have any questions regarding any changes to this Privacy Notice, please contact us as set out in the section "How can I exercise my privacy rights and contact Toyota?" above.

### **Conflicts or Inconsistencies between the General Privacy Policy and this Privacy Notice**

If there is any conflict or inconsistency between a provision of this Privacy Notice and a provision of the General Privacy Policy, this Privacy Notice will prevail.