

## Privacy Notice – Full-Service Lease

Last updated: 27 May 2021

Accessible at: <https://toyotaconnected.eu/our-privacy-policy/products>

Toyota Connected Europe Limited (TCEU) of 14-18 Handyside Street, London, N1C 4DN is providing your employer with information society services, including the provision of location data, when you drive company vehicles whilst performing your employment duties.

Our DPO can be contacted at [privacy@toyotaconnected.eu](mailto:privacy@toyotaconnected.eu)

### Brexit and the UK

From 1<sup>st</sup> January 2021, the UK will have passed the transition period, and be a third country in terms of the EU GDPR rules. This means that any data transfers coming into the UK from the EEA, will need a specific clause in the contracts to which we are party to, for example, the most common ones used are the EU Model Standard Contractual Clauses [Standard Contractual Clauses](#). For now, transfers of data from the UK to the EEA, will not require any additional measures, but this will be kept under review, and this policy kept up to date.

Transfers of data to outside the EEA, remain the same.

### What do we do?

TCEU is a provider of technology and data services analysing data from vehicles and other terminal equipment. This helps drivers drive safely, and more efficiently. TCEU can help both you as part of your employment responsibilities, and your employer, maintain the company vehicles as well as manage the logistics of moving vehicles around in both an efficient and effective way. TCEU provides an Information Society Service to your employer at their request.

Where the data is regarded as personal data and is processed as part of your employment, the specific details about your personal data shared with TCEU will be covered in your employer's privacy policy. To enable the provision of the service, your employer shares certain data, including location data about their vehicles with TCEU. TCEU enriches and analyses this data making the information more meaningful. For example, your employer is able to track the location of vehicle in terms of GPS co-ordinates. TCEU, once the data is shared, can analyse it, and enrich it, to turn it into places, and trips, which helps you employer plan their workloads, secure their fleet of vehicles. TCEU acts as a Controller of your data, where it is deemed to be personal data.

Your employer will use both a web portal for administering company vehicles, and a mobile app that may by choice be used by individual employee drivers to submit data, rather than supply the same information in paper form, or by other methods, streamlining processes, making it more efficient for both the employee and the employer. These are tools used during your employment, and again covered as part of your employer privacy policy. There is one exception of cookies and similar technologies, which may be set with your, or your employer's consent. We use these cookies to understand how you use these applications on the web portal and mobile app, and this helps us improve our products for both you and your employer.

#### Where do we collect your data from?

Shared from your employer, and collected directly from the vehicle you drive in the course of duties of your employment

TCEU's technology allows vehicles to be tracked. This involves health data/diagnostic data about the vehicle, for example, mileage, tyre pressure, and brake fluid levels, and this data relates to the vehicle, regardless of who is driving the vehicle. This is not regarded as personal data for business owned and used vehicles.

Our technology can also collect and analyse location data from the vehicle, again about the vehicle's location and travel points. The intention of tracking location is to track the vehicle and not the driver. The employer has a legitimate interest in understanding where the vehicles are located at specific points in time. Mostly, the location data tracked during the course of planned journeys by your employer, during your employment time, will not be regarded as personal data. However, in the event that it may be regarded as personal data, TCEU also has a legitimate interest in providing this Information Society Service to your employer at their request.

#### Via cookies and similar technologies (directly from you or your employer):

We collect information, which can be regarded as observed, that is data collected by cookies or similar technologies, which we capture as part of you or your employer using our mobile app and or web portal. See our [FSL Portugal Cookie Policy](#) for details of the ones we use.

#### Categories of personal data

##### Device information

Details about how you used the app or web portal, what you looked at, what you clicked on, how long you spent on pages, what device you have, your location via IP address, and what browser and operating system you are using.

### Vehicle location data

Longitude and latitude of the vehicle, vehicle information number, and vehicle registration number, along with dates and times of points of travel of the vehicle, as well as trip and journey information.

### Other data

From time to time, you may contact us with a query, and provide information voluntarily. For example, you may send us an email or letter, in which you disclose additional personal information. We will process this information based on Legitimate Interests until advised differently.

### Who we share your data with?

To the extent that geo location data is regarded as personal data, TCEU will be regarded as sharing enriched and analysed location data about your employer's vehicles with your employer. However, as mentioned earlier in this policy it is also likely that the location data collected from vehicles during the time they are driven in an employment capacity may be regarded as non-personal data, and merely passed on to your employer at their request in the course of running their business activities.

For data collected from use of the devices used in your employment, mobile app and web portal, we use both Google, Hotjar and Mapbox to provide services to us. If you additionally give consent to these companies using your data, we will be sharing the data collected from your devices, about how you use these devices, with these companies, and we will be regarded as Joint Controllers with those companies.

### The purposes and retention

Lawful Basis	Purpose	Category of Data	Retention
Legitimate Interest	To provide your employer with enriched and analysed location data about the vehicles you drive as part of your employment duties and in order to manager their fleet of vehicles.	<u>Vehicle location data</u>	One week
Consent to cookies and similar technologies	Analysing the data of how you or your employer use the web portal and/ or mobile application to help us improve our products.	<u>Device information</u>	12 months
Consent to	Third parties; Google,	<u>Device information</u>	Please refer to these

cookies and similar technologies (third parties)	HotJar and Mapbox - Analysing the data of how you or your employer use the web portal and/ or mobile application to help them improve their products.		third-party companies' policies  <a href="https://www.mapbox.com/legal/privacy">https://www.mapbox.com/legal/privacy</a>  <a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>  <a href="https://www.hotjar.com/privacy/">https://www.hotjar.com/privacy/</a>
Legitimate Interests	General business activity outside the services being provided and requested.	<u>Other data</u>	Assessed on a case by case basis
Legal Obligation	In the event that we are requested to provide your personal data to the authorities in accordance with the law, or any other legal obligation, such as for tax purposes.	<u>Any of the data categories above</u>	Determined by the legal obligation requiring the retention

#### How do we collect your consent?

We collect your Consent in various way, and this will be clear at the point in which we ask for your Consent. However, most commonly the request will come via the cookie style banner when you or your employer use the mobile app or web portal.

#### Withdrawing Consent

Where you have given us your Consent to process your data, you have a real choice about how we use this data, and for how long. To withdraw your Consent, simply email [Privacy@Toyotaconnected.eu](mailto:Privacy@Toyotaconnected.eu)

To prevent any further collection of data via cookies and similar technologies, you will additionally need to block TCEU's cookies [FSL Portugal Cookie Policy](#) and you can do this via your browser, as well as delete the cookies. Only you as the user of your device is able to do this part. For further information and instructions, you can visit the [allaboutcookies.org](http://allaboutcookies.org) website.

#### Where do we process your data?

We are a global company that uses service providers all around the world to help deliver the services to your employer. Where we process your data outside the EEA, we will ensure that we use one of the permitted measures in the UK and EU GDPR that allow us to do this. Most commonly this will be with the EU Model Standard Contractual Clauses, and these can be seen

here [Standard Contractual Clauses](#).

- EEA (Netherlands, Germany, Ireland) for hosting
- Belgium where some of our staff are located, and occasionally within other countries in the EEA
- UK

## Your Rights

### Your right of access.

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details).

### Your right to rectification.

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified.

### Your right to erasure.

You can ask us to delete your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable).

### Your right to restrict processing.

You can ask us to suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It won't stop us from storing your personal information though.

### Your right to data portability.

In certain circumstances, you have the right to obtain personal information you've provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice. Usually this will be in CSV/Excel format.

### Your right to object.

For some processing activities, you will have the right to object to the processing of your personal data. Whilst this is not always an absolute right, we will consider every request:

### Your rights in relation to automated decision-making and profiling.

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of a contract between you and us, your Consent, or authorised by law.

### Your right to withdraw consent.

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

### Your right to lodge a complaint with the supervisory authority.

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website

at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

#### Confidentiality and Security of your data

We are committed to keeping your personal information that you provide to us secure, and we will take precautions to protect your personal information from loss of confidentiality, integrity and availability.

We have implemented information security policies, both organisational and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees receive training in respect of personal data and security. All the processors that we use to process data on our behalf, also go through a due diligence process, to assess their suitability to processing our data, as well as being contractually obliged to implement the necessary measures.