

PRIVACY NOTICE
FOR THE PROCESSING OF YOUR PERSONAL DATA IN THE FRAMEWORK OF
THE TOYOTA STANDARD AND REMOTE 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 process your personal data and Vehicle 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 (“**Toyota Standard Services**”)
- the remote services you can subscribe to through your MyToyota account and access through the MyToyota App and Portal (“**Toyota Remote Services**”)

The Toyota Standard Services and the Toyota Remote Services are hereafter referred to as the “**Services**”.

The Privacy Notice together with the **General Toyota Privacy and Personal Data Protection Policy** (the “**General Privacy Policy**”) describe in general terms; how we collect your Personal Data, why we collect it, what we do with your Personal Data, to whom we share it, how we protect it, and your choices as to how your Personal Data is used.

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

The following entities are responsible for the collection and use of your Personal Data:

Toyota Motor Europe SA/NV (**TME**)

Avenue du Bourget/Bourgetlaan 60

1140 Brussels

Belgium

In partnership with:

Toyota Connected Europe Limited (TCEU)

10th Floor, 14-18 Handyside Street

London N1C 4DN

United Kingdom

TME and TCEU are hereafter collectively referred to as “**Toyota**”, “**we**”, “**our**” or “**us**”.

TME and TCEU have concluded an agreement governing the processing of personal data in connection with the Services. We will, upon your request, provide you with a summary of the key elements of this agreement. Please use the contact details set out in the section “How can I exercise my privacy rights and contact Toyota?” for requesting the summary.

TCEU’s primary role is to provide data analytical services whereas TME’s primary role is to develop and market the Services and to support the (de-)activation of your subscription to the Services.

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 monitor, analyse and improve the quality of the Services;
- To handle your queries or complaints;
- To keep record of your privacy preferences;
- To support our sales and marketing activities;
- To secure, maintain and support our IT systems, applications and networks;
- If reasonably necessary in connection with a dispute or an investigation in which we are or may become involved either directly with you or with a third party;
- When we are required by law enforcement authorities, regulators or courts to disclose your Personal Data;
- To conduct research and development to improve our products and services
- To share the data with third parties, where applicable;

- Where we are legally obliged to process your Personal Data (e.g. we must retain certain billing information pursuant to tax and accounting laws);

We share your Personal Data with third parties only for the following purposes:

- If you have a Toyota vehicle with on-board Internet access functionality, the Electronic Communications Service provider (“**ECS Provider**”) that will provide the Internet access service may be legally obliged to obtain certain identification information relating to you. Toyota will collect that identification information from you and provide that information to the ECS Provider;
- Where you have given your consent, to enable our network (national distributors and Authorised Retailers/Repairers) to contact you in the framework of the provision / implementation of certain products or services;
- Where we are required by public authorities (e.g. law enforcement authorities), regulators 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, we will share with the insurer the Personal Data that is necessary for the insurer to implement such contract and provide insurance coverage;
- We may share your Personal Data with third parties. For example, we may share your Personal Data to providers of value-added services (to allow them to provide value-added services to you) or to research institutions or spare part suppliers for research and development purposes. We will only share your Personal Data with third parties where the law allows us to do so;
- We use 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. Our main service providers include the following:
 - [○ Microsoft \(hosting data on infrastructure in the Netherlands\)](#)
 - [○ Amazon Web Services \(cloud hosting data on infrastructure in Germany\)](#)
 - [○ OrangeCyberdefense \(monitoring the cybersecurity infrastructure\)](#)
 - [○ Digital Charging Solutions ‘DCS’ \(providing electrical vehicle charging station location information in Germany\)](#)
 - [○ KDDI Corporation \(telecom partner for vehicle telematics data exchange in Japan\)](#)
 - [○ Infosys \(providing business support and product development services from India\)](#)
 - [○ Our national distributors who, on our instruction, may assist us from time to time with customer queries](#)
 - [○ Mapbox \(providing real-time navigation services and information about points of interest, traffic conditions, etc.\)](#)
 - [○ Usabilla \(collecting feedback on the app from a user\)](#)
 - [○ MongoDB \(database provider\)](#)
 - [○ Optimisely \(Configuration management\)](#)
 - [○ Datadog \(providing monitoring service\)](#)

Whose Personal Data will be processed?

We process the Personal Data of the person who has subscribed to the Services.

Please note that, if you allow persons to drive / use your Toyota vehicle, you have the responsibility to communicate this Privacy Notice to that driver / user, in order to inform him/her about our 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 (disconnect the services from your name)

See here [*insert hyperlink to [https://www.toyota-europe.com/download/cms/euen/How to delete your personal data_tcm-11-2142090.pdf](https://www.toyota-europe.com/download/cms/euen/How%20to%20delete%20your%20personal%20data_tcm-11-2142090.pdf)*] for practical and step-by-step guidance on how you can remove your Personal Data.

Which Personal Data will be processed?

We will collect and use the following categories of Personal Data in connection with the Services:

Account information

- 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);
- Information relating to your MyToyota-account (e.g. preferred contact method, subscription information, communication language preference, Authorised Retailer/Repairer preference);
- Emergency contact information (if you have provided such information on your MyToyota account);
- Data relating to your privacy preferences (e.g. date you gave your consent; what you consented to; date on which you withdrew your consent; how consent was given (for example from which device); etc.).

App usage related data (e.g. login statistics, error message tracking).

Billing information

- Data relating to invoices and payments for the Services (e.g. history of your payments for the Services, invoices, VAT number, if applicable).

Location data

- Geolocation information linked to your Toyota vehicle and/or your smartphone (e.g. geolocation of your vehicle (longitude and latitude), planned destination, journeys, direction of travel), at precise times.

Telematic data

- Driving behaviour (e.g. driving logs, driving speed, acceleration and brake speed);
- Data we use to identify your vehicle (e.g. vehicle registration plate, vehicle identification number, date of purchase of the vehicle, the IP address of the SIM-card that is built into the Data Communication Module in your vehicle);
- Technical vehicle data (e.g. mileage, fuel consumption, warnings) and diagnostic data (e.g. system failures and warning lights).

Vehicle information

- Current and historical vehicle-related data (e.g. accessories, tyres, finance, insurance, warranty-related information, if applicable);
- Interaction history (e.g. planned maintenance and service bookings).

Security-related data

- We log certain information about your usage of our IT systems, applications and networks in order to protect our systems and our customer's data. For example, during a limited period of time we keep logs of who has accessed your connected car data, and when, so as to be able to investigate any potential threat to the confidentiality, integrity and availability of your connected car data.

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

1. Necessary for the performance of our contract with you

For the provision of the Services we generally process your Personal Data to perform the contract through which you have subscribed to by accepting the corresponding Terms of Use.

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;
- We process Personal Data 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;
- We process Personal Data 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);
- Where we want to use your Personal Data in anonymized form to improve our products and services or to develop new products or services, the anonymization of our Personal Data is done on the basis of our legitimate business interest to innovate, to improve our products and services and to develop new products and services.
- 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, where you have given your consent we may process Personal Data:

- To improve and innovate our products and services;
- To gain insights into how our vehicles are performing in order to inform our marketing and advertising campaigns;

- To share the vehicle data with our partners.
- To personalise our communications towards you
- To support you in case of vehicle warnings

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 MyT App. If the "privacy mode" is active, we will cease to use such geolocation data. See here [*insert hyperlink to https://www.toyota-europe.com/download/cms/euen/How%20To%20activate%20Privacy%20mode_tcm-11-1806231.pdf*] for practical and step-by-step guidance on how you can activate the "privacy mode".

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 will 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?

Below, in the section "Summary: which Personal Data do we use, why and for how long?", we explain for how long we keep your Personal Data.

Summary: which Personal Data do we use, why and for how long?

The below table provides a summary overview of the Personal Data that we use, why we use them and for how long.

Purposes	Lawful Basis	Categories of Data	Retention Period
<ul style="list-style-type: none"> - To (de)activate your subscription to the Services - To provide the Services to you - To handle your queries and complaints 	<p>Necessary for us to perform our contract with you</p>	<ul style="list-style-type: none"> - Location data - Telematic data - Account information - Billing information - Vehicle information 	<ul style="list-style-type: none"> - We keep the telematic data and the location data for a period of 12 months (starting from the date we collected these data). - Where we create scores as part of the provision of the Services to you (eg. when we provide Hybrid Coaching), we keep these scores for 5 years starting from the date the score was created. Scores are different from your telematic data and location data because scores are analytical data derived from your telematic data and location data. As set out above we only keep your telematic data and location data for 12 months. - We keep your account information, billing information and vehicle information for the duration of your relationship with us and for a further period after your account closure in accordance with the applicable statutory limitations. We may keep these data beyond the retention periods above if: <ul style="list-style-type: none"> o Reasonably necessary in connection with a dispute or an investigation in which we are or may become involved either directly with you or with a third party; or

Purposes	Lawful Basis	Categories of Data	Retention Period
			<ul style="list-style-type: none"> We are legally obliged to keep these data for longer pursuant to tax and accounting laws.
To comply with a legal obligation (e.g. to ensure fair competition there are laws which require us to share certain car-related data with, for example, dealers and repairers)	When necessary for us to comply with a legal obligation	<ul style="list-style-type: none"> Telematic data Account information Vehicle information 	We do not store the data specifically for this purpose.
To innovate, to improve the existing Services to create new Toyota Standard and Remote, and to gain insights from data to help meet our sustainability goals.	<ul style="list-style-type: none"> If you have consented thereto; or Where this constitutes further processing of your Personal Data and provided it meets the purpose limitation and compatibility test, the processing may be based on the original lawful basis of performance of a contract with you; or Our legitimate interest to innovate, to improve the Services, to develop new Services and to gain insights to help meet our sustainability goals. 	<ul style="list-style-type: none"> Location data Telematic data Account information Billing information Vehicle information 	We keep the data for a period of up to 2 years from the date we collected the data.
To ensure the confidentiality, integrity and availability of our systems and Services	<ul style="list-style-type: none"> When necessary for us to comply with a legal obligation Our legitimate interest to protect the confidentiality, integrity and availability of our systems and Services 	We collect certain information to monitor the security of our systems and Services (and thus of our customer's data). For example, we	<p>A period up to 24 months, that may vary by country. We may keep the data longer if:</p> <ul style="list-style-type: none"> Necessary as part of an ongoing investigation into a cyber security incident;

Purposes	Lawful Basis	Categories of Data	Retention Period
		keep logs of who has accessed our systems and when.	- Necessary for us to conduct audits of the security of our systems, applications or networks.
Where we are legally obliged to collect and retain your Personal Data (e.g. we must retain certain billing information pursuant to tax and accounting laws)	When necessary for us to comply with a legal obligation	- Account information - Billing information	For as long as we are legally obliged to keep the data. The retention requirements vary from one country to the other. For example, in Belgium we are required to keep certain accounting records for 7 years following the end of the relevant fiscal year.
When we are required by law enforcement authorities, regulators or courts to disclose your Personal Data	- When necessary for us to comply with a legal obligation - The legitimate interest for us and society in general to honour data disclosure requests from law enforcement authorities, regulators or courts - When necessary for the performance of a task carried out in the public interest	- Location data - Telematic data - Account information - Billing information - Vehicle information - Security-related data	We will not retain data for this purpose, and only pass it on as and when requested to by law enforcement authorities, regulators or courts.
Keeping record of your privacy preferences	- Where necessary to comply with our legal obligations under applicable data protection laws - Your and our legitimate interest to adequately manage your privacy preferences	Data relating to your privacy preferences (e.g. date you give your consent; what you consented to; date on which you withdrew your consent; how consent was	We keep the data for up to 3 years after consent was given or withdrawn depending on applicable local laws.

Purposes	Lawful Basis	Categories of Data	Retention Period
		given (for example from which device); etc.).	
To support our sales and marketing activities	- Only if you have consented thereto	- Location data - Telematic data - Account information - Billing information - Vehicle information	For as long as you have consented to our use of your data for sales and marketing activities.
If reasonably necessary in connection with a dispute or an investigation in which we are or may become involved either directly with you or with a third party	- Legitimate interest - When necessary for us to comply with a legal obligation	Any one or more of the following data categories: - Location data - Telematic data - Account information - Billing information - Vehicle information - Security-related data	We will only retain data for this purpose on a case-by-case basis when the need arises.

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;

- The transfer is governed by the 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. 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.

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). For example, where we collect and use your Personal Data to develop new Services, and where we are allowed to do so without your prior consent, you have the right to opt-out of such processing by *explain easy-to-use method for costumers to opt-out from R&D data processing*.

- 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 <https://ico.org.uk/make-a-complaint/>
- **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.
- If our processing of your Personal Data is based specifically on your consent, you have **the right to withdraw** that **consent** at any time.

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, or requests that cannot be made via your MyToyota account, please send an email to Privacy@Toyotaconnected.eu. 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.