

TCEU User Research Privacy Policy

This policy is provided by Toyota Connected Europe Limited (“TCEU”, “we”, or “us”), 2nd Floor 80 Turnmill Street, London, England, EC1M 5QU.

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.

This Policy relates to our receipt of (i) certain personally identifiable contact details that we may receive from your employer or from certain third party user researcher recruitment companies that TCEU works with; (ii) user research & usage data that we gather through your participation in TCEU user research activities; and (iii) promotional/marketing material that we record and produce during your participation in TCEU user research activities.

What does TCEU do?

User research. TCEU works with certain third party user researcher recruitment agencies (“**recruitment agencies**”) listed below and certain affiliate or partner business of ours, in order to recruit suitable user testers (“**participants**”) who can participate in user research activities run by TCEU. We notify these recruitment agencies and/or affiliate and partner businesses regarding what characteristics we require our participants to display (such as age range, driving history, gender etc.). The recruitment agencies and/or affiliate and partner businesses will then provide prospective participants’ contact details (including name, email address and contact phone number) to TCEU to allow us to arrange the relevant participants’ attendance at an agreed location and time to participate in the user research activities. The user research activities will sometimes involve the participant driving a car and being invited to use certain functions within the car. On other occasions, the participants will simply be invited to participate in an interview. TCEU is then able to gather insights through observing and video/audio recording the participants’ interactions and reactions within the car and/or their interviews as appropriate. TCEU can then use these insights to improve our products for the benefit of our customers.

Promotions/marketing. We may sometimes record participants’ participation in the user research project and invite participants to participate in interviews with a videographer throughout the project. We will then produce a promotional/marketing video showcasing the user research project which will then be shared within the Toyota group as set out below. We will always make you aware specifically if this section will apply to your participation.

Describing the data collection for our user research activities

Participants

1. We will notify recruitment agencies and/or your employer (as appropriate) regarding what characteristics we require our participants to display (such as age range, driving history, gender, type of role within your organisation etc.).
2. If you satisfy the relevant criteria set by us, the recruitment agency or your employer (as appropriate) will provide your contact details (including your name, email address and contact phone number) directly to us so as we may contact you to arrange your participation in the user research activities.
3. The user research activities will either involve (i) you being invited to sit in the driver seat of & control a Toyota car and to use certain functions within the car; or (ii) you being interviewed by a member of TCEU staff. TCEU is then able to gather insights through observing your activities within the car/ your interview.
4. Where we are relying on consent, you will be asked to give consent to the processing of your data for the purposes as described in the table below, including observing your interactions with the car, analysing your journey and (if appropriate) preparing a promotional video to be used for the Toyota group’s internal business purposes.
5. Where we have made you specifically aware, we will take a video and audio recording of your journey showing your interactions with the features of the vehicle and your reactions. We will also track your location and usage of the features and functions of the car.

6. We may interview you regarding your participation in the user research activities and we may take a video and audio recording of such interview. We may use any such recording to assist our analyses and also in the production of the internal promotional/marketing video noted above.
7. The raw video/audio footage and usage data that we gather during your participation in the user research activities gets deleted after 30 days, or sooner if you withdraw your consent.
8. The promotional video that we **may** produce (and which may contain video & audio recordings of you) shall be stored by TCEU and shared within the Toyota Group and then deleted after 1 year, or sooner if you withdraw your consent.
9. We will also retain your name and limited contact details for up to 1 year to comply with any legal obligation imposed on us to identify the drivers of our vehicles to relevant authorities.

Where we collect your data from?

1. From recruitment agencies and/or your employer, when they send your contact details to us to allow us to arrange your participation in the user research activities/interviews and when they confirm that you satisfy certain criteria that we have requested our participants satisfy.
2. From you and from the car when you participate in the user research activities.
3. The video and audio recording that will be taken while you participate in the user testing and while you participate in any interview.
4. The recruitment agencies that we work with are:
 - a. L&E RESEARCH, a North Carolina S-Corporation with a head office located at 5505 Creedmoor Road, Suite 200, Raleigh, NC 27612
 - b. IPSOS NV BELGIUM, a Belgium company listed on the Belgium Trade and Companies Register under the following number BE0456.823.775 and its principal place of business at Grote Steenweg 110, 2600 Berchem, Belgium

Categories of Data

- **Contact details**
First name, surname and email address, provided to us by IPSOS.
- **Demographic/defined characteristic data**
TCEU works with recruitment agencies and/or your employer to recruit participants who display certain defined attributes or characteristics. TCEU may request participants based on factors such as job, whether you have a driving license, age of your car, whether you have children, your age range, your income range, your gender, statements you have made to the recruitment agency and/or your employer regarding your use of the car, your car usage patterns and your living zone (city/countryside). Whilst we do not receive this data directly from the recruitment agency and/or your employer, given that we request participants based on satisfaction of these criteria, we are able to make inferences about what demographic you are in based on this data.
- **Opinion, reaction and usage information collected during the user research activities and interviews**
The data that that you convey during the research activities and interviews such as your actions, your facial expressions and your opinion of how TCEU products could be improved and the usage data that we gather from the car.
- **Video and Audio Recordings**
TCEU will record your participation in the user research activities and the interviews

Profiling

We work with the recruitment agency and/or your employer to recruit participants who display certain requested characteristics/attributes. For instance, we may request participants who are aged between 30 to 35, who live in an urban area and who are a Toyota driver. Through this exercise (and when combined with personal data that we gather about you during the user research project), we will engage in profiling. We undertake profiling to help us develop a broad perspective and understanding of the users of our vehicles for the benefit of our customers.

Who we share your data with?

Your Personal Data will 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.

The promotional video that may be produced to showcase the user research project would only be shared within the Toyota group including Continental Automotive GmbH, Toyota Motor Corporation, Toyota Motor North America, Toyota Connected North America, Toyota Connected Europe, Toyota Motor Europe, TRI-AD and Woven City.

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 our 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;
- BizViz Technologies Pvt Limited – India – Business support;
- Infosys Limited - India – Business Support;
- Endava (UK) Ltd – United Kingdom – Business Support;
- Rubén Llorach (sole trader) – Videographer and Editor; and
- any of the Toyota Group companies.

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	To conduct product research to improve our service and provide better value to our customers	<ul style="list-style-type: none"> • Contact details • Job • Driving license type • Age of the car • Whether you have any children • Age range • Income range • Gender • Information that you provide regarding your use of technology and use of your car • Usage patterns of the car • Living zone (city / countryside) • Opinion, reaction and historical usage information relating to our products collected from IPSOS and during your participation in the user research and any interview. 	Up to 30 days from the date we obtain the Personal Data or until you object to our processing your Personal Data	TCEU only

Consent	To conduct product research to improve our service and provide better value to our customers and to prepare an internal promotional video covering the user research project	Audio and video recordings	<p>The raw video & audio footage shall be stored for up to 30 days from the date we obtain the Personal Data or until you object to our processing your Personal Data.</p> <p>The promotional video (which may include video and audio recordings of you) shall be stored and shared within the Toyota group for up to 1 year from the date we obtain the Personal Data or until you object to our processing your Personal Data.</p>	<p>TCEU only.</p> <p>The promotional video shall be shared with other Toyota Group companies including Continental Automotive GmbH, Toyota Motor Corporation, Toyota Motor North America, Toyota Connected North America, Toyota Connected Europe, Toyota Motor Europe, TRI-AD and Woven City.</p>
Legitimate Interests	To conduct product research to improve our service and provide better value to our customers and to prepare an internal promotional video covering the user research project	Audio and video recordings	<p>The raw video & audio footage shall be stored for up to 30 days from the date we obtain the Personal Data or until you object to our processing your Personal Data.</p> <p>The promotional video (which may include video and audio recordings of you) shall be stored and shared within the Toyota group for up to 1 year from the date we obtain the Personal Data or until you object to our</p>	<p>TCEU only.</p> <p>The promotional video shall be shared with other Toyota Group companies including Continental Automotive GmbH, Toyota Motor Corporation, Toyota Motor North America, Toyota Connected North America, Toyota Connected Europe, Toyota Motor</p>

			processing your Personal Data.	Europe, TRI-AD and Woven City.
Complying with applicable laws, rules, regulations, guidance, codes, and industry/professional rules and regulations	Legal obligation	Any and all of the data categories as and when the circumstances arise	On a case-by-case basis	On a case-by-case basis, and will include police and competent authority court orders

Your right to object

Where we rely on Legitimate Interests when processing your Personal Data, you have the right to object to such processing unless we have a compelling and legitimate reason to continue processing your Personal Data. If you want to object to the processing, we will keep minimal details about when you objected. Please email privacy@toyotaconnected.eu and we will delete your data.

Withdrawing your Consent

Where we rely on your Consent to process your data, you will have the right to withdraw your consent to TCEU continuing to process your data. You can withdraw your Consent at any time by emailing Privacy@Toyotaconnected.eu

Security measures

Whilst we take all reasonable precautions to protect Personal Data from loss, misuse, alteration or destruction and comply 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

TCEU does 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 (such as video recordings), 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**.