

## TCEU Gazoo Racing Privacy Notice

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 privacy notice, except where otherwise indicated. Our Data Protection Officer can be contacted by sending an email to [Privacy@toyotaconnected.eu](mailto:Privacy@toyotaconnected.eu).

This notice describes your personal data being processed by TCEU as part of the Toyota Gazoo Racing World Rally Team (“TGR-WRT”). TCEU receives data from TGR-WRT, and provides analytical services to TGR-WRT, Salvesenintie 6, 40420 JYSKÄ Finland <https://tgr-wrt.com> for the purposes of using data to contribute to the overall strategy of winning motor sport races.

### What does TCEU do – the purposes?

TCEU analyses secondary data sources, such as weather, and road and track conditions, along with data shared by TGR-WRT, such as the diagnostic health care data of the race vehicles, and driving behaviour of the motor racing teams members to analyse and optimise the best conditions and configurations that will contribute to Toyota’s strategy for winning motor sport races.

### Where we collect your data from and categories of data?

#### Secondary data

Examples include weather apps, and road infrastructure characteristics such as inclines, declines, and corners, location data.

#### Derived (analysed data)

This is data that is combined together from secondary resources and data shared with TCEU, which is then enriched, analysed, and profiled, to create scoring, and predicted behaviours that may help with the strategy to win the race.

#### Data shared with TCEU by TGR-WRT.

#### Race vehicles

Typically this is data that is associated with the vehicle, which we refer to as **diagnostic or health care data regarding the car**. These can include, but are not limited to data such as tyre pressure, tyre tread, brake pad levels, window wipers on/off, miles and kilometres, brake fluid, window wiper fluid levels.

#### Drivers of race vehicles

Typically we call this **behavioural data**, and this relates to how you drive the race car, and the actions you take whilst driving, for example, but not limited to, acceleration, deceleration, braking, changing gears, how you turn the corners, driving speed.

#### Location data

Precise GPS points, and the date and time at any given GPS point, typically related to the race track itself.

## Profiling

As part of analysing the data described above, TCEU can create profiles that help predict best driving conditions, way of driving, either according to the racing driver, racing vehicle, or racing location, or any combination of these.

## Who we share your data with?

The personal data that TCEU creates, (the analysed and profiled data) will be shared with TGR-WRT.

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:

- 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](https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf);

## 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
Legitimate Interests  To <b>request objection</b> to processing based on Legitimate Interests email <a href="mailto:Privacy@toyotaconnected.eu">Privacy@toyotaconnected.eu</a>	To provide analytical scores and profiles to help define the race strategy	<ul style="list-style-type: none"><li>• Secondary data</li><li>• Derived data</li><li>• Location data</li><li>• Behavioural data</li><li>• Diagnostic and health care vehicle data</li></ul>	Up to 30 days from the date we obtain the Personal Data or until you object to our processing your Personal Data	TGR-WRT
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

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### 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](mailto:privacy@toyotaconnected.eu) and we will delete your data.

### 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 have the following rights:

- to 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;
- to request the rectification of any inaccurate Personal Data that we hold about you;
- to request the erasure of your Personal Data in certain circumstances;
- to 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.