



PRIVACY NOTICE – TCEU IT Systems (EXTERNAL Data Subjects)

This policy is provided by Toyota Connected Europe Limited (TCEU, we, or us), 2 Floor, 80 Turnmill St, London EC1M 5QU. TCEU is a Controller of your data in respect of the purposes described in this policy. Our Data Protection Officer can be contacted by sending an email to Privacy@toyotaconnected.eu

Who does this Privacy Notice apply to?

Any persons joining a global Slack or Teams TCEU channel, or uses any of our infrastructure systems, such as office 365 and emails, that is not an employee of TCEU, or engaged directly by TCEU as staff.

What does TCEU do?

Toyota Connected Europe is a data company. We provide services that relate to the way you move around using vehicles. This could be data that we collect from cars, or data to help you buy, lease, rent, or choose a car, or generally move around, mobility. More generally Toyota Connected Europe contributes to helping people understand more about their vehicles, how economical they are, the costs of travel, problems with their vehicles and many similar things that will help you, and governments understand the future of mobility.

Where we collect your data from?

As part of our day-to-day operations, including collaborating and communication with Toyota Group companies and affiliates, and anyone connected with, or working with TCEU on specific projects, we make several Information Technology tools available on a case-by-case basis, where external parties to TCEU can join the channels. These global channels and Information Technology tools can be accessed by persons all around the world. Where you have joined a channel, or accessed an Information Technology tool, any personal data will be collected from you directly, or by a team member, who discusses you as part of the project.

Categories of Data

Contact details

Name, work email address, work telephone numbers, contract details, calendar availability, photo of person who has joined the slack channel or accessed the Information Technology channel, the name of the company who they are working for.

Note: Any personal data you voluntarily give TCEU via submitting or entering details within the slack channel or other Information Technology tool, results in you becoming a Controller of that data if you have not followed the company policy in terms of personal data that may be processed within a global Slack channel.

Who we share your data with?

Your personal data will be shared with Toyota Group companies and affiliates, and anyone connected with, or working with TCEU on specific projects. It will be clear from the Slack channel who the different organisations are, as they do vary by specific channel.

When third parties are given access to your personal data, TCEU will take the required contractual, technical and organizational measures to ensure that your personal data is only processed to the extent necessary.

TCEU also uses service providers to help deliver its services. These providers, known as Processors, can only process your data on our behalf. The main processors that we use are:

- Infosys- Belgium – Business Support
- Slack

The Purposes

Lawful basis	Purpose	Categories of Data (some or all of each category mentioned)	Retention Period	Who your data is shared with
Legitimate Interests	To collaborate via Slack, Teams, or any other Information Technology tool on projects	Contact details	180 days as standard but can be extended on a case by case by where it is necessary in case of disputes.	Parties as described in this policy and dependent on the specific Information Technology tool you have joined.

	that are global (involve external parties)		7 years for emails.	
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Security measures

Whilst TCEU takes all reasonable precautions to protect personal data from loss, misuse, alteration or destruction and complies 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, TCEU does not make those inferences. **Special Category data should not be processed in these Slack/Team channels.**

Children's Data

TCEU does not process children's data.

Where is your data processed?

TCEU 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 according to risk, 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.

Your rights with respect to your personal data

You may be entitled 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.
- 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](#)).

If you would like to exercise your rights, please let us know by getting in touch via emailing Privacy@toyotaconnected.eu

You also have a right to make a complaint to the regulator – Tel 0303 123 1113

Version Control

Version	Date	What has changed
V0.1	July 2022	Creation of Privacy Notice for external Slack users
V0.2	October 2022	Addition of Teams Global channels
V0.3	November 2022	To cover all Toyota Connected Europe's Information Technology systems being used
V0.4	Dec 2023	Reviewed content and updated TCEU address