



## PRIVACY POLICY – TEST DRIVE

This policy is provided by Toyota Connected Europe Limited (“TCEU”, “we”, or “us”), 2<sup>nd</sup> Floor, 80 Turnmill Street London EC1M 4NJ.

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](mailto:Privacy@toyotaconnected.eu)

TCEU is a data sharing partner with Toyota Portugal, a Toyota group member <https://www.toyota.pt/legal/politica-de-privacidade>

This Policy relates to your use of the Test Drive product only.

### What does TCEU do?

Test Drive = information about the journey you take when you test drive a vehicle.

Toyota Connected Europe is a data company. We are collecting your data to help you understand information about your Test Drive. For example, understanding what percentage of your journey used electricity and fuel, as well as comparisons between your existing car and the Test Drive Car.

### Describing the data collection for Test Drive

Test Drive Customers (“Customers”)

1. You will be asked to give consent to the processing of your data for the purposes as described in the table below, including analysing your journey, showing you your journey, and using your analysed journey for further analysis and statistics. You will be giving your consent to both TCEU and Toyota Portugal.
2. The car you drive is a connected car, this means the car which will capture data during your journey, about the car and the way you drive the car.
3. After the journey ends, the data will be shared with TCEU, who will analyse the data provided during your Test Drive journey, to show you information about the Test Drive, including how this compares to your existing car.
4. The Sales Executive at the dealership you are taking your Test Drive with, can show this analysed journey on an IPAD or another device.
5. If you agree to provide your email address to the Sales Executive as part of your Test Drive, you will receive a copy of the journey by email, which will include an additional link to provide further details.
6. With your permission, TCEU retains the journey data after 90 days, to help us improve our products.
7. TCEU may also process the data in an aggregated form to provide statistics across the Toyota group as well as with external parties including governments.

8. The collection of your personal data via non-essential cookies and similar technologies set on your device when you click on the link within the email, will be processed by both TCEU and Toyota Portugal.

#### Toyota Dealer Employees (“Employees”)

1. The collection of your personal data when you use the web portal that enables Customers to benefit from Test Drive (“Web Portal”), in your role as an employee of the Toyota Dealer will be covered as part of your Employee Privacy Notice with your employer. The Web Portal is used in the performance of your duties at the discretion of your employer. TCEU will be acting as a Processor, processing your data, on behalf of your employer either entered directly by you or by your employer.
2. Your employer will set up an account on the system for you.
3. You will need to agree to the Terms and Conditions of our Web Portal to use it.
4. Agreement to our cookies (where consent is required) is by you and/or your employer, and for the sole purposes of TCEU. TCEU is acting as an independent Controller of your data for the setting of both essential and non-essential cookies and use of data collected via cookies. Your employer can prevent the setting of these cookies by setting up default rejections of our cookies on your devices, or you can also refuse the cookies.

#### Where we collect your data from?

##### For Customers:

1. Your car journey data is shared with TCEU by Toyota Portugal.
2. Derived data is the data created by TCEU that results from TCEU’s analysis your journey.
3. Third party Toyota group member, who provide us with licence plate, make and model of the vehicle you are test driving, details regarding any consent you have given.
4. Non-essential Cookies and similar technologies used when you visit the website by clicking the link in the email you receive as part of our Test Drive.

##### For Toyota Dealer Employees:

1. From you or your employer, when you use the Web Portal.

#### Categories of Data

##### Existing car details (Customers only)

We can, as part of offering information about your Test Drive, make comparisons with your existing car. We do this by asking you for information, such as estimated miles per gallon, and looking up the technical details from a third-party supplier.

##### Technical details collected from, or information submitted by using our website portal (Employees only)

Technical data, such as your IP address, your internet browser, the pages you have visited on this website portal, and in relation to your movements and clicks within our website portal, including information relating to your session and device information, for example hardware model, operating system, version, and mobile network information (Employees only)

## Connected Car Data (Customers and Employees)

- Telematic Data – data related to the car, rather than the driver, for example, fuel level, warning lights, tyre pressure, brake fluid level, Vehicle Identification Number, IMEI, MSISDN, SIM Card ID, Licence plate, make and model of the vehicle.
- Driver behavioural data – data relating to actions initiated by you, the driver. For example, how much fuel you have consumed, how many times you accelerated, when and you used the brakes, your speed, how much and how often your vehicle used electrics rather than fuel.
- Geo Data – data relating to your location when you drive your car. This is precise points, including the longitude and latitude of your vehicle, direction of travel, including the precise time. Generally, we will receive data points at 10 second intervals during your Test Drive. However, it can be less frequent depending on your actual journey, such as driving on long straight roads may mean we collect data less frequently.
- Analytics and profiles, including scoring to help you understand how you drive your vehicle, and how economical it was, derived or inferred data.

## Who we share your data with?

Where TCEU is a Controller of your personal data, we may share this with:

- Toyota Portugal - <https://www.toyota.pt/legal/politica-de-privacidade>

And may 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.
- Toyota group members

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](https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf),
- Toyota Motors North America – America – Administration and support,
- Mobile operator – for carrying the data from the car to our systems,

- Mapbox – That provide longitude and latitude characteristics, such as elevation of streets, which we then use to combine with our data, as well as enabling the rendering of the route map visually.

## The Purposes, Retention, and Lawful Basis

<u>Lawful Basis</u>	<u>Purpose</u>	<u>Categories of Data</u> (some or all of each category mentioned)	<u>Retention Period</u>	<u>Who your data is shared with</u>
Consent	Analyse Test Drive information for the purposes of helping you decide on future purchases of a hybrid car.	Connected car data. Existing car details	90 days from the data of your Test Drive	Toyota Portugal <a href="https://www.toyota.pt/legal/politica-de-privacidade">https://www.toyota.pt/legal/politica-de-privacidade</a>
Consent	Product research and development to help us improve our digital platforms	Connected car data.	1 year	TCEU only
Consent	Analytics and statistics to inform insights.	Connected car data	1 year (after 1 year the data is kept anonymised)	Toyota Portugal
Consent  Cookies and similar technologies (Employee only)	Analytics for product improvement– Web Portal	Technical details from use of our websites and or apps	13 months, or until you withdraw consent.	TCEU is a Joint Controller with Google - <a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a> Hotjar

				<a href="https://www.hotjar.com/legal/policies/privacy/">https://www.hotjar.com/legal/policies/privacy/</a> Mapbox <a href="https://www.mapbox.com/legal/privacy">https://www.mapbox.com/legal/privacy</a>
Legal Obligation  GDPR Article 7 (1)	Consent records, evidence of when and how you gave consent.	Your name, email address and date you consented to receive a copy of your Test Drive information, as well as the dealer in which you gave your consent.	3 years	
Legal Obligation  GDPR Article 32	To implement security measures to protect the data, including essential cookies used for security via our web portal	Technical details from use of our websites and or apps  Employee contact details	Minimum 12 months	Will be decided on a case-by-case basis, when circumstances arise that cause the sharing of data to prevent or detect abnormal activity. If it is necessary to share the data, TCEU will decide on the most appropriate basis for sharing, which will normally be legitimate interests or legal obligation.
Vital Interests	Where we are faced with a decision to process your data, including sharing it	Any or all of the data that is being processed.	On a case-by-case basis	Decided on a case-by-case basis. For example, if during your Test Drive, you are

	protect your vital interests or that of another person			involved in an accident, and we need to contact police/emergency services.
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### Withdrawing consent

If you withdraw your consent, we will keep minimal details about when you gave consent and when you withdrew your consent.

#### Test Drive Information

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

#### Cookies and Similar Technologies – Web Portal

Please email [privacy@toyotaconnected.eu](mailto:privacy@toyotaconnected.eu) and we will delete your data, plus you will also need to remove our cookies as detailed in our Cookie Policy <Here>

### Using and analysing your data – “Profiling”

The analysis we do about your Test Drive, will be used to provide you with information about the efficiency of your Test Drive journey using your driver behaviour, as well as technical points in the car. As part of providing these statistics, we build a profile about your use of the vehicle, for example, using speed, brakes, acceleration.

When using the Web Portal as an employee, and if you have provided your consent, we will analyse your use, to help us understand how you have used the Web Portal to help us improve this portal for use by companies and their employees.

### 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

We do 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.

### 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.