

PRIVACY AND DATA PROTECTION POLICY

TOYOTA ECODRIVERS PLATFORM

Issue date:	19 April 2024
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1. Introduction

During the Olympic and Paralympic Games of 2024 in Paris (France) Toyota will provide Connected Vehicles to provide mobility solutions. The organisation of the Olympic and Paralympic Games 'Paris2024' chooses the Drivers during the Games.

When you are a designated Driver with a Toyota Fleet Vehicle, the Toyota EcoDriver Platform (hereinafter "Platform") can be used to strive towards our environmental and sustainable goals.

The overall purposes of the data processing is to provide evidence of, and help reduce CO2 emissions of each vehicle during the period of the games.

This Privacy Policy describes the personal data being processed by TCEU & TME as part of you using the Toyota EcoDriver web-based application while driving a designated Toyota fleet vehicle.

If you accept the Policy, you are agreeing to Us processing your Personal Data in the ways that are set out in this Policy.

2. Who are we?

TME and TCEU are Joint-Controllers for your data in respect of the purposes described in this Privacy Policy, except where otherwise indicated (hereinafter the "Parties", "Us" or "We"):

Toyota Connected Europe Limited ("TCEU")

2nd Floor 80 Turnmill Street,
London, England, EC1M 5QU,
England entreprise number 11283634,
<https://toyotaconnected.eu/privacy-policy/>.

Toyota Motor Europe NV/SA ("TME")

Avenue du Bourget/Bourgetlaan 60,
1140 Brussels Belgium,
Belgian CBE 0441.571.714
<https://www.toyota-europe.com/legal/privacy-policy>

We have organised a Single Data Protection Contact Point which will handle your questions or requests relating to this Policy, your Personal Data (and its Processing).

For any questions or requests or complaints concerning the application of this Policy or to exercise your rights, as described in this Policy, you may contact us at the Point of Contact during Paris 2024: privacy@toyotaconnected.eu

3. WHAT ARE THE PURPOSES

The overall purposes of the data processing of vehicles being driven during the Paris Olympics, is to provide evidence of, and **help reduce CO2 emissions** of each vehicle during the period of the games.

The application will provide driving analytics of the vehicles and driver and will **provide data for Key Performance Indicators** for the Parties. Through our hardware installation within the vehicle, We will collect different types of data to monitor your eco statistics, such as emissions and characteristics of the Driver (acceleration, speed, braking, ...)

The processing of the data of the Vehicles helps to ensure that the Vehicles **remain safe and fit** for logistics during Paris 2024 Games.

4. CATEGORIES OF DATA

Contact details:

When a Driver agrees with the Terms and Conditions and this Policy, we will process the driver's Name, Email address, unique identifier; The Driver will have a dashboard that will show details about their driving (Ecodriver statistics)

Vehicle information:

Information about the vehicle you have driven (VIN), including any warning signals, such as low pressure, vehicle information number, low brake fluid by way of example only, as well as fuel level and odometer readings.

Driver behaviour information

This is data about how you drive the vehicle, your actions within the vehicle to include how you accelerate, decelerate, brake, turn on and off the vehicle, and your speed. These data points are captured with a date and time periodically during each trip you make in the designated vehicle. For example, some data points might be collected every few seconds, and others may be collected only when you turn on or off the vehicle.

Analytics and scoring information

This is information that we calculate from both the vehicle information and your driving behaviour information, including calculating CO2 emission. We create a profile of how you drive the vehicle, and this gives you a score, which you will then be able to compare as an average with other drivers using the designated vehicles during the Paris Olympic games

Technical data

Data collected from accessing the website URL which is provided to you to see the results of your driving behaviour, as well as data collected from employees and staff that view aggregated data from the website URL to understand and monitor any warning signs in designated vehicles, as well as aggregated data per vehicle.

When accessing our websites, we will process data collected from the device that you use to access our systems, including IP address, device type, browser type and version, user ID, actions performed, dates and times of actions, and your location. Some of this data is necessary to ensure the security of our systems, whilst other data will be analytical insights on how you have used the website. When visiting our website you'll be able to configure the settings of the cookies, only functional cookies are essential for the use of the website.

5. WHO WE SHARE YOUR DATA WITH

We process data in proportionate and mostly aggregated way. We may disclose (aggregated) data to the following categories of recipients:

- Our authorised staff members.
- Our affiliates and subsidiary companies who are helping delivering the services.
- Third party business partners:
 - Paris 2024 organisation.
 - The fleet management system.

- Service providers: companies that provide services for or on behalf of our company, for the purposes of providing such services, providers used who are processing data:
 - i. Amazon Web Services - Hosting and data infrastructure, storage, certified with the ISO27001 Information Security Management System; https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf;
 - ii. Infosys – technical expert resource provider.
- Other third parties:
 - when required by law or as lawfully necessary:
 - to comply with the law, requests from authorities, court orders, legal procedures, obligations related to the reporting and filing of information with authorities, etc.;
 - to verify or enforce compliance with policies and agreements; and
 - to protect the rights, property or safety of our companies and/or its customers;

Please be aware that third party recipients—especially service providers who may offer products and services to you or offer applications or via their own channels— may separately collect Personal Data from you. In such case, these third parties are solely responsible for the control of such Personal Data and your dealings with them will fall under their terms and conditions.

6. WHERE DO WE COLLECT YOUR DATA FROM AND WHERE IS IT PROCESSED/STORED

There are two sources of data:

- Data collected directly from the Vehicle. (Toyota)
- The fleet management system - will be sharing Drivers information with TCEU.

These sources will be analyzed to strive for CO2-reduction and ECO-driving.

Where do we process and store your data?

In principle your personal data will be processed within the EEA.

Your Personal Data may be transferred to recipients which may be outside the EEA and may be processed by us and these recipients outside the EEA. In connection with any transfer of your Personal Data to countries outside the EEA that do not generally offer the same level of data protection as in the EEA, our companies will implement appropriate specific measures to ensure an adequate level of protection of your Personal Data. These measures can for instance consist in agreeing with recipients on binding contractual clauses guaranteeing such adequate level of protection.

Our main service providers are mentioned in article 5.

7. THE PURPOSES, RETENTION AND LAWFUL BASIS

Lawful Basis	Purpose	Categories of Data	Retention Period
Driver using a connected car, Performance of contract	<p>Strive for Environmental and sustainability goals. To be an EcoDriver and analyse your driving during the use of the Vehicle.</p> <p>analytics and scoring on your driving behaviour of designated vehicles used during the Paris Olympics.</p>	All of the categories of data listed (Article 4)	Until 30 th of September 2024
Website visitor, Consent	Where you have given your consent to the processing of technical data for the purposes of analytics when you access our websites (see Cookie Policy)	Technical data	See Cookie Policy (retention periods depending on the cookies)
Legitimate interest	Data processed from the connected vehicles that are processed from the hardware for operational, driving behaviour, diagnostic and vehicle health reasons, this includes improvement of the services (by example when used as a fleet)	All of the categories of data listed (Article 4) except the contact details	Until 30 th of September 2024

8. SECURITY MEASURES

We have a set of technical and organisational security measures in place to protect your Personal Data against unlawful or unauthorised access or use, as well as against accidental loss or damage to their integrity. They have been designed taking into account our IT infrastructure, the potential impact on your privacy and the costs involved and in accordance with current industry standards and practice.

9. SPECIAL CATEGORY DATA

We will not be processing special category data for the purposes outlined in this Privacy Policy.

10. CHILDRENS' DATA

We will not be processing childrens' data for the purposes set out in this Privacy Policy

11. 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;

It is important for us to maintain accurate and up-to-date records of your Personal Data. Please inform us of any changes to or errors in your Personal Data as soon as possible by contacting us at the Data Protection Contact Point. We will take reasonable steps to make sure

that any inaccurate or outdated Personal Data is deleted or adjusted accordingly.

- 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

Finally, please note that you have the right to file a complaint against the Data Controller with the relevant data protection authority ("DPA").

With respect to TCEU the relevant DPA is the United Kingdom Commissioners Office - 0303 123 1113. With respect to TME, the relevant DPA is the Belgian Data Protection Authority.

12. Miscellaneous

This Privacy policy is governed by and will be construed with the laws that are stipulated in the Terms and Conditions of the application and any litigation will be brought before the courts stipulated in the Terms and Conditions.

If any term or other provision of the Privacy Policy is invalid, illegal or incapable of being enforced by any rule or law, or public policy, all other conditions or provisions of the Policy will nevertheless remain in full force and effect. Upon such determination that any term or other provision is invalid, illegal or incapable of being enforced, the Parties will negotiate in good faith to modify these provisions so as to effect the original intent of the Parties as closely as possible.

The requirements of this Policy supplement, and do not replace, any other requirements existing under applicable data protection law. In case of

contradiction between what is written in this Policy and requirements in applicable data protection law, applicable data protection law will have priority. The Clauses of the Terms and Conditions are applicable on the processing of personal data.

Date	Version	What Changed	By whom
January 2024	0.1	Revised Privacy Policy	TCEU DPO
April 2024	0.2	Revised Privacy policy	TME legal and compliance