

Suzuki Connect **User Privacy Policy**

This privacy policy (“**Policy**”) describes how Suzuki Motor Corporation and Magyar Suzuki Corporation Ltd. (“**we**”, “**us**” and “**our**”), collect and process personal data about you through your use of Suzuki’s Connect Services. This includes your use of the Suzuki Connect smartphone application (the “**App**”), your Suzuki Registered Vehicle (the “**Registered Vehicle**”) and any other relevant services provided through Suzuki Connect (together forming the “**Connected Services**”). In this Policy, “**you**” and “**your**” refers to an individual who is using or accessing the Connected Services.

This Policy covers the collection of personal data about a “**User**” of the Connected Services. The User, being the primary User who registers for the App (“**Primary User**”), may also add a secondary user (“**Secondary User**”) to its account by following the instructions in the App. The Primary User is able to restrict the Secondary User’s permissions within the App. A Secondary User will be deemed a User for the purposes of this Privacy Policy and will therefore be subject to the provisions of the Privacy Policy as if he/she is a User.

However, please note that even if a User leases their Registered Vehicle to another person, we will collect personal data, including the location of the Registered Vehicle, in order to provide the Connected Services. If a User leases their Registered Vehicle to another person, the User needs to provide this Policy to them so that such person can understand the processing of his/her personal data in the context of the Connected Services.

This Policy also sets out how we use and protect your personal data, your rights in relation to this personal data, and who we share it with. Suzuki Motor Corporation and Magyar Suzuki Corporation Ltd. are acting as independent controllers of your personal data. Please see section 8 below for details on how you can contact us.

1. What types of personal data may we hold about you?

1.1 Personal data means any information that can be used to identify you. We collect this personal data from a variety of sources, including the personal data you provide to us directly, and the personal data we collect about you from third parties.

1.2 We may be required by law to collect certain personal data about you, or as a consequence of any contractual relationship we have with you. Failure to provide this data may prevent or delay the fulfilment of these obligations.

(a) Personal data you provide to us, and personal data collected from other sources

1.3 We collect your personal data when you provide it to us directly, and through other third-party sources. This includes direct identifiers such as your name and contact details, but also indirect identifiers such as data that we may collect from the electronic device and/or Registered Vehicle that you use to access the Connected Services. For example, we will process the personal data that you provide when signing up for a Suzuki Connect account via the App. This may also include the collection of personal data through your use of the Connected Services, such as location data and driving history.

1.4 We will also collect personal data about you from other sources, for example, from the dealership where you purchased your Registered Vehicle, or from other distributors or third-party service providers.

(b) Types of personal data we collect

1.5 The categories of personal data that we process about you may include all of the categories that you provide to us through your use of the Connected Services, or which we collect from you or from third parties as described in this Policy. Examples of the personal data we may process about you include:

- (i) **Personal and contact details** – such as your name, postal and email address, phone number, and nationality.
- (ii) **Device and Electronic Information** – such as the IP address of your smart phone that holds the App, device type, device id, OS version of your device and the GPS information of your Registered Vehicle.
- (iii) **Vehicle Information** – such as VIN, vehicle type, numbers on license plate, on-board diagnostic information, and driving data, including [acceleration/braking habits, mileage, engine speed, vehicle speed and average fuel economy].
- (iv) **Vehicle Maintenance Related Information** – such as the history of maintenance and parts replacement of your Registered Vehicle.
- (v) **Authentication details** – such as your credentials which allow you to access your Connected Services account, including your user ID and password.
- (vi) **Service-Related Information** – such as information on use of your Connected Services, date of contract, renewal and termination of your Connected Services, your use of your Registered Vehicle, and information about your requests and inquiries.

2. How we use your personal data and the basis on which we use it

2.1 We use your personal data for the following purposes:

- (a) To provide and personalise the Connected Services to you, such as to notify you of certain Registered Vehicle features such as the timing of regular inspections;
- (b) To ensure that the Connected Services are working correctly;
- (c) To deal with your enquiries and requests regarding the Connected Services;
- (d) To obtain proof of your personal details to enable us to verify your Suzuki Connect account;
- (e) To meet our anti-money laundering obligations and to comply with any relevant tax obligations and our obligations under the regulations of the European Union;
- (f) To cooperate with regulators and law enforcement bodies where required;
- (g) To understand how you use the Connected Services and to enable us to derive knowledge to enable us to develop new and improved services in the future; and
- (h) To conduct data research and analysis to enhance and/or improve the Suzuki vehicles and services, and to develop new Suzuki vehicles and services.

2.2 We process your personal data under the following lawful basis:

- (a) To fulfil our contractual obligations to you;
- (b) To comply with our legal obligations;

- (c) Based on your explicit consent; and
- (d) To meet our legitimate interests.

2.3 Where we rely on our legitimate interests, we have undertaken an assessment where we have balanced your rights against ours to ensure that our interest is not overridden by the interests you have to protect your personal data. In this instance, we rely on our legitimate interests to understand how you use the Connected Services, to enable us to adequately provide the services to you, and to allow us to derive knowledge to enable us to develop new and improved services in the future.

2.4 As described in section 2.2, we may obtain your consent to collect and use certain types of personal information when we are required to do so by law (for example, in relation to our direct marketing activities). If we ask for your consent to process your personal data, you may withdraw your consent at any time by changing the setting in the App.

3. **Automated decisions about you**

3.1 We currently do not carry out any automated decisions about you, however if we do begin to carry out this type of processing in the future, we will update this policy with the relevant information in advance of that processing taking place.

4. **In what circumstances might your personal data be shared with others?**

4.1 Your personal data will mainly be used by us to provide you with our Connected Services; however we may also disclose your personal data to:

- (a) **Third-party service providers** that perform services on our behalf, such as IT suppliers, cloud service providers, customer support service providers, third party payment providers, marketing services and other business operations service providers. For example, we may partner with other companies to process secure payments when you sign up for the Connected Services, or to optimize our services, send marketing emails, and analyse and store data.
- (b) **Dealers and distributors** that sell our products and provide services in connection with your Registered Vehicle. We may share your contract information and Registered Vehicle malfunction information with these parties in connection with the provision of the Connected Services (e.g. for periodical maintenance, recall, or vehicle health check purposes).
- (c) **Members of the wider Suzuki Motor Corporation group.** We work closely with other businesses and companies that fall under our family. We may share certain information about your use of the Registered Vehicle, for example, with other companies in our group for internal reporting purposes.
- (d) **Law enforcement agencies, courts, regulators, government authorities or other third parties.** We may share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- (e) **Independent repairers.** We may share Vehicle Information and Vehicle Maintenance Related Information with independent repairers as required under the law, to allow independent repairers to make any necessary repairs to your vehicle and to comply with requirements as set out under EU law.
- (f) **Asset purchasers.** We may share your personal data with any third party that purchases, or to which we transfer, all or substantially all of our assets and business, or a part of our

business such as the Connected Services. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal data uses it in a manner that is consistent with this Privacy Policy.

4.2 Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfers" below for more information.

5. **International Data Transfers**

5.1 As we are a global business, we may need to transfer your personal data to countries outside of your country of residence where we or our service providers have facilities. These countries may have data protection laws and regulations that differ from those in your country of residence, and may not offer the same level of protection, or be considered as providing an adequate level of protection, as provided for under EU or UK law.

5.2 In some cases, your information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for information under applicable laws (such as those in the European Union or the United Kingdom). When we conduct such transfers, we put in place appropriate safeguards (such as standard contractual clauses) in accordance with applicable legal requirements.

5.3 Information located outside of your home country may be subject to access by that country's government or its agencies under a lawful order.

5.4 For more information on the appropriate safeguards in place, please contact us through the information provided in the 'Contact us' section below.

6. **Data Security and Storage**

6.1 We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal data we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. We evaluate these measures on a regular basis to ensure the security of the processing.

6.2 We will keep your personal data for as long as necessary to fulfil the purposes for processing set out in this Policy. Once our relationship with you has come to an end, we will retain your personal data for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with any relevant tax obligations
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding the services

For further information on how we retain your personal data, and for how long, please contact us at the details set out in section 8 below.

6.3 If there is any personal data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of this personal data.

7. Your rights over your personal data

7.1 With respect to the personal data we hold about you, you have rights to: access, correct, request the deletion of, restrict our use of, object to certain uses of, receive in a usable electronic format and transmit to a third party (also known as the right of data portability), lodge a complaint with a local data protection authority in relation to our processing of, or withdraw any consent supporting uses or disclosures of your personal data.

7.2 We encourage you to contact us to update or correct your data if it changes or if the personal data we hold about you is inaccurate. We will contact you if we need additional data from you in order to honour your requests. If you would like to exercise such rights or if you have questions about your rights, please contact us at the details below.

8. Contact Us

8.1 As set out above, Suzuki Motor Corporation and Magyar Suzuki Corporation Ltd. are acting as independent controllers, and are responsible for the personal data we collect and process about you in regard to the Connected Services.

8.2 Suzuki Motor Corporation's contact details are privacy-contact-jp@mail.connect.suzuki and registered office is at 300 Takatsuka-cho, Chuo-ku, Hamamatsu-shi, Shizuoka-ken, Japan.

8.3 Magyar Suzuki Corporation Ltd.'s contact details are privacy-contact-eu@suzuki.hu and registered office is at 2500 Esztergom, Schweidel JOZSEF utca 52, Hungary.

8.4 Suzuki Motor Corporation's Data Protection Officer can be contacted at: 300 Takatsuka-cho, Chuo-ku, Hamamatsu-shi, Shizuoka-ken, Japan, or by e-mail at dpo@hhq.suzuki.co.jp.

8.5 Magyar Suzuki Corporation Ltd.'s Data Protection Officer can be contacted at: 2500 Esztergom, Schweidel JOZSEF utca 52, Hungary, or by e-mail at dpo@suzuki.hu (Mr. József KOCSIS).

8.6 We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your relevant supervisory authority.

NOTE : The contact details above should only be used for inquiries relating to our privacy practices and the processing of your personal information as mentioned in this Policy. For other inquiries and requests, please kindly contact our distributors in your country, using their contact details which are available here(<https://www.globalsuzuki.com/globallinks/>). Please note that we will not respond to inquiries and requests made through the contact details above which do not relate to how we collect and process your personal information.

9. Changes to the Policy

9.1 You may copy this Policy. We may modify or update this Policy from time to time.

9.2 If we change this Policy, we will notify you of the changes. Where changes to this privacy policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

9.3 This Policy has last updated on 01/03/2024.