

PRIVACY NOTICE **Toyota's Platform**

At Toyota we strive to honour the language and spirit of the law, and to undertake open and fair business activities to be a strong corporate citizen. We are convinced that, in order to build a trusted relationship with our customers and to provide reliable connected car services, it is essential for us to protect your personal data and to be open about the way we handle your personal data.

*

This Privacy Notice explains how we will process your personal data and vehicle data ("**Personal Data**") when providing the services, you can subscribe to through your Account ("**Account**") and access through the Platform ("**Platform**"):

- the standard car services ("**Standard Services**")
- the remote services ("**Remote Services**")
- the smart car services ("**Smart Services**")
- the connected insurance score visualization services (the "**Insurance Services**")
- the HomeCharge Solution ("**HomeCharge Solution**")

Hereafter, in this document, the services listed above are collectively referred to as the ("**Services**") and, the Standard and Remote Services are together referred to as ("**Connected Services**").

The Privacy Notice together with the [General Toyota Privacy and Personal Data Protection Policy](#) (the "**General Privacy Policy**") describe how we collect your Personal Data, why we collect it, what we do with your Personal Data, with whom we share it, how we protect it, and your choices as to how your Personal Data is used.

Version : 3
Date : September 2024

Table of Content

1. Who is responsible for the collection and use of your Personal Data?	3
2. Why do we collect and use your Personal Data?	3
3. Why do we share your data with third parties?	4
4. Whose Personal Data will be processed?	5
5. Types of users	5
A. Registered User	5
B. Guest User	6
6. Which Personal Data will be processed?	6
7. What are the legal bases for Toyota's use of your Personal Data?	8
8. How can I suspend the use of my vehicle's geolocation?	9
9. General data collection and retention period summary	9
10. Will my Personal Data be transferred to other countries?	12
11. What are my rights in relation to my Personal Data?	13
12. How can I exercise my privacy rights and contact Toyota?	14
13. Changes to this Privacy Notice	14
14. Cookies and similar technologies	14
15. We may share your Personal Data with Authorized Retailers/Repairers	14
16. Conflicts or Inconsistencies	15

1. Who is responsible for the collection and use of your Personal Data?

The following entities are responsible for the collection and use of your Personal Data:

Toyota Motor Europe SA/NV ("**TME**")
Avenue du Bourget/Bourgetlaan 60
1140 Brussels
Belgium

When providing the Services to you, and depending on your vehicle's model and or the subscription you took, Toyota may collaborate with the following partners acting as joint controllers:

- Toyota Connected Europe Limited ("**TCEU**"), 2nd Floor 80 Turnmill Street London EC1M 4NJ
- Toyota Motor Corporation ("**TMC**"), 1 Toyota-cho, Toyota, Aichi, 471-8571, Japan
- Our network of National distributors, as listed [here](#)

TME and its partners have concluded agreements governing the processing of personal data in connection with the Services. We will, upon your request, provide you with a summary of the key elements of these agreements. Please use the contact details set out in the section "How can I exercise my privacy rights and contact Toyota?" for requesting the summary.

In a nutshell:

- TCEU mainly provide data analytics for some of the offered Connected Services whereas TME's primary role is to develop and market the Services and to support the (de-)activation of your subscription to the Connected Services, as well as the additional value-added services within the Connected Services bundle.
- Depending on your vehicles model and generation, your vehicle may communicate Personal Data through TMC-systems to provide you with certain Services.

Our National distributors provide various assistance services for your vehicle and may contact you using connected data, with your consent.

2. Why do we collect and use your Personal Data?

We collect and use your Personal Data for the following purposes:

- To provide you the Services and manage your subscriptions and related payment
- To monitor, analyse, innovate, and improve the quality and performance of our products and services, as well as the products and services of our partners
- To perform updates over the air to update systems and improve functionalities and fix bugs or defects
- To help us gain aggregated insights into how our vehicles are performing and also to inform our marketing and advertising campaigns
- To handle your queries or complaints
- To keep record of your privacy preferences
- To support our sales and marketing activities and improve our communications
- To send you personalised communications
- To secure, maintain and support our IT systems, applications, and networks

Commented [LF(1)]: @Charles Cuvelier (TME)
Do we need to mention sub-processors here and list Pay-D/JPM?

Commented [C(1R2)]: Not here.

Version : 3
Date : September 2024

- If reasonably necessary in connection with a dispute or an investigation in which we are or may become involved either directly with you or with a third party
- When we are required by law enforcement authorities, regulators, or courts to disclose your Personal Data
- Where we are legally obliged to process your Personal Data (e.g., we must retain certain billing information pursuant to tax and accounting laws)

3. Why do we share your data with third parties?

We may share your Personal Data with third parties, where the law allows us to do so, for the following purposes:

- Where we are obliged to do so to fulfil our legal obligations, such as our obligations under environmental or competition law.
- If you have a vehicle with on-board Internet access functionality, the Electronic Communications Service provider ("**ECS Provider**") providing the Internet access service may be **legally obliged to obtain certain identification information relating to you**. Toyota will collect that identification information from you and provide them to the ECS Provider;
- Where you have given your consent (or where we are otherwise allowed to do so by law), to enable our network (affiliates, our [National Distributors](#) and Authorised Retailers/Repairers) **to contact you in the framework of the provision/implementation of certain products or services or to conduct product improvement, research and development**. Our Authorised Retailers/Repairers are the retailers (companies and sole traders) that are authorized by our National Distributors to sell Toyota/Lexus vehicles. Our National Distributors are our national marketing and sales companies that are responsible for (a) establishing and managing our networks of authorised retailers, brand enhancement activities and customer management responsibilities in their national territory, and (b) selling our Toyota/Lexus vehicles at wholesale level;
- Where we are required by public authorities (e.g., law enforcement authorities), regulators and courts **to disclose your Personal Data to them**;
- If reasonably **necessary in connection with a dispute** in which we are or may become involved, we may share your Personal Data with, for example, the other party(ies) involved in the dispute or with a court of law;
- If you have a telematic insurance contract, we will share with the insurer the Personal Data that is necessary for the insurer **to implement such contract and provide insurance coverage**;
- We may share your Personal Data to providers of value-added services (to allow them to provide value-added services to you) or to research institutions or spare part suppliers **for research and development purposes**.

We may need to share your Personal Data with additional third parties in relation to the topic listed below:

- cybersecurity-related services who help us protect the confidentiality, integrity and availability of the data, systems and applications that we use to provide the Services;
- business support services and product development services;
- database management solutions;
- configuration management solutions;
- to provide you dedicated services provided with the help of third parties;

Version : 3
Date : September 2024

- to process your payment via secured payment service provider;
- monitoring and analytics tools that help us monitor the infrastructure and cloud services that we use to provide the Services.

On this [page](#) you can find an overview of the data recipients who may have access to part or whole of your Personal Data. We always strive to share a minimal amount of personal data to data recipients, only for specific and defined purposes and wherever possible in an anonymous or aggregated way.

4. Whose Personal Data will be processed?

We process the Personal Data of the person using a [Toyota vehicle](#) in respect of which there is an active Subscription for the Services or using our Platform.

Please note that, if you allow persons to drive or use your vehicle, you have the responsibility to communicate this Privacy Notice to that person, to inform him/her about our processing of his/her Personal Data in the context of the Services.

Prior to transferring the ownership of your vehicle to another person or to a reseller, you must:

- Remove, to the extent technically possible, all data and content (including any Personal Data), if any, that you have stored on your vehicle and that is accessible from your Account; and
- Remove the vehicle from your Account.

5. Types of users

While using the vehicle you can be considered either as a:

A. Registered User

Registered user, meaning the person who has downloaded the App, created a user profile and loaded said profile in the vehicle using the Head Unit device.

There are two categories of Registered user:

i. Main Registered User, which is normally intended for the vehicle owner. There can only be one Main Registered User assigned to a vehicle, and has access to the following features:

- Activate/Deactivate the Services
- Add a vehicle into the Garage
- Access to the geolocation of the vehicle
- Access the Trip data
- Book service appointments
- Use Remote Services
- Logging into the vehicle Multimedia Unit
- Manage payment methods

ii. Secondary Registered User, is any other Registered User than the Main Registered User, which have access to the following features:

- Add a vehicle into the Garage
- Book service appointments
- Logging into the vehicle Multimedia Unit

Commented [LF(2)]: @Charles Cuvelier (TME) . Not related to payment, but should we include « and/or app»? Some data may be processed by app only usage.

Commented [LF(3)]: Sounds strange to put in this section. Might be better to add a section for user obligations or something?

Commented [LF(4)]: @Charles Cuvelier (TME) +
« - Activate paid subscriptions
- Management payment methods »

Version : 3
Date : September 2024

Note that, via the App, the Main Registered User can access the following data of the Secondary Registered User:

- Geolocation of the vehicle
- Trip data

A Registered User (Main and Secondary) can deactivate the use of geolocation at any time (see “How can I suspend the use of my vehicle’s geolocation?”).

Our vehicles have the capability to load multiple unique Registered User profiles. When a Registered User loads his/her profile, that profile (including the data linked to it) will continue to be visible on the Multimedia Unit even if somebody else will subsequently drive the vehicle.

B. Guest User

A Guest User is a person that has not loaded a user profile in the vehicle either because (s)he has not created a user account via the App or because (s)he has chosen not to load it.

A Guest User has access to Smart Services in the vehicle subject to acceptance of the Terms of Use of Toyota’s Platform and acknowledgement of the Privacy Notice.

Note that if the Guest User has activated the Smart Services for the vehicle, and if there is a Main Registered User for that same vehicle, the Main Registered User may access the following data through the App:

- Geolocation of the vehicle
- Trip data

A Guest User can deactivate the use of geolocation at any time (see “How can I suspend the use of my vehicle’s geolocation?”)

To benefit of a full connected experience, a person using the Guest User can create an account in the App.

6. Which Personal Data will be processed?

We will collect and use the categories of Personal Data listed below in connection with the Services. Note that when referred to in this Privacy Notice, the category of Personal Data may include partly or wholly the specific Personal Data listed under each category.

1. Account information

- Identity information (e.g., title, family and first name, mother tongue);
- Contact information (e.g., mobile number, email address, postal address);
- If you have a vehicle with an on-board Internet connectivity functionality, identification information requested by the ECS Provider which provides the Internet access service (e.g., copy of ID documents);
- Information relating to your Account (e.g., preferred contact method, subscription information, communication language preference, Authorised Retailer/Repairer preference);
- Emergency contact information (if you have provided such information on your Account);

Commented [LF5]: @Charles Cuvelier (TME) we are now collecting Billing Address from account to use in the invoices. Should we make it explicit here?

Commented [C(5R2): Added under billing information

Version : 3
Date : September 2024

- Data relating to your privacy preferences (e.g., date you gave your consent; what you consented to; date on which you withdrew your consent; how consent was given (for example from which device));
- Preferred Head Unit settings (e.g. background color, navigation settings, volume settings);
- Any sound or image files that you may upload onto the Platform and/or your Account;
- IP address;
- Device identifier and authorised device information (e.g. phone model and OS version used for Digital Key);
- User's feedback on specific events or triggers of the Services;
- Data we use to identify your vehicle (e.g., vehicle registration plate, vehicle identification number, date of purchase of the vehicle, the IP address of the SIM-card that is built into the Data Communication Module in your vehicle);
- App or service usage related data (e.g., login statistics, error message tracking).

2. Billing information

- Data relating to invoices and payments for the Services (e.g., history of your payments for the Services, history of transactions, billing address, invoices, VAT number, if applicable). Note that TME do not store your complete payment method details in our systems, only the last 4 digits of your payment card(s) and related expiry date. The complete payment method details are stored by our selected payment service providers, who adhere to and are licensed under the relevant payment services regulations.

3. *Location data*

- Geolocation information linked to your vehicle and/or your smartphone (e.g., geolocation of your vehicle (longitude and latitude), planned destination, journeys, direction of travel), at precise times;
- Journey information (e.g., recent destinations, favourite destinations).

4. *Telematic data*

- Driving behaviour (e.g., driving logs, driving speed, acceleration, and brake speed);
- Data we use to identify your vehicle (e.g., vehicle registration plate, vehicle identification number, date of purchase of the vehicle, the IP address of the SIM-card that is built into the Data Communication Module in your vehicle);
- Technical vehicle data (e.g., mileage, fuel consumption, warnings) and diagnostic data (e.g., system failures and warning lights);
- Driving scores which consist of derived data from the other telematic data.

5. *Vehicle & accessory information*

- Current and historical vehicle-related data (e.g., accessories, tyres, finance, insurance, warranty-related information, if applicable);
- Interaction history (e.g., planned maintenance and service bookings);
- Information about your Toyota car (vehicle Identification Number);
- Digital Key hardware specific information (ECU ID, BLE serial numbers);
- Head Unit hardware specific information (serial number of device, software version).

Commented [LF6]: @Charles Cuvelier (TME)

2 points:

Should we details what we collect for payment method?
Number, exp date, billing address.

We do store last 4 digits and expiration date in our systems.

Commented [LF7]: @Charles Cuvelier (TME)

This sentence could be misleading. We do no store payment methods in our OWN systems, yes, but we do store them in our sub-processors. Shouldn't this be made more clear?

Commented [CC(7R2)]: Charles to improve wording.

6. *HomeCharge information*

- Identifier of the HomeCharge;
- Location of the HomeCharge;
- Communication data and related metadata (e.g., date and time of the communication between customer and support agent)
- Technical event and application logs (e.g., logs that the support agent has reset the charger)
- Remote diagnostic data (e.g., status of the HomeCharge)

7. *Security-related data*

- We log certain information about your usage of our IT systems, applications, and networks to protect our systems and our customer's data. For example, during a limited period, we keep logs of who has accessed your connected car data, and when, to be able to investigate any potential threat to the confidentiality, integrity, and availability of your connected car data.

8. *Voice data*

- To provide you with voice command assistant services in your car, we may process the speech audio data you input and associated metadata. You can always disable this processing by turning off the voice data toggle in your car settings.

7. [What are the legal bases for Toyota's use of your Personal Data?](#)

1. *Necessary for the performance of our contract with you*

For the provision of the Services, we generally process your Personal Data to perform the contract you have subscribed to by accepting the corresponding Terms of Use.

2. *Our legitimate interests*

Where applicable, we process your Personal Data if this is necessary to pursue our legitimate interests in relation to the provision of the Services, provided that our interests are not outbalanced by your interests or rights and freedoms (e.g., your privacy rights). For example:

- We process your Personal Data to allow our Toyota network partners (e.g., National Distributors, Authorised Retailers/Repairers) to contact you in the framework of maintenance reminders and crash management;
- We process your Personal Data to allow us to contact an emergency contact person that you have designated and who must be contacted in case you and/or your vehicle is involved in a crash;
- We process your Personal Data in case you have a vehicle with an on-board Internet connectivity functionality, to allow external providers (e.g., the ECS Providers that provide the Internet Access Service) to fulfil their legal obligation to identify you (by collecting your identification information);
- Where we want to use your Personal Data in anonymized form to improve our products and services and perform insights and analysis or to develop new products or services, the anonymization of your Personal Data is done on the basis of our legitimate business interest to innovate, to improve our products and services and to develop new products and services;

Version : 3
Date : September 2024

- To disclose your Personal Data when we are required to do so by law enforcement authorities or the courts.

3. Our legal obligations

We process your Personal Data if this is necessary for us to comply with our legal obligations, including to comply with decisions rendered by courts or public authorities. For example, if we have charged you for your use of the Internet access service, we may be obliged to retain the invoice (and your Personal Data on the invoice) for a legally prescribed period of time.

4. Based on your consent

In certain instances, we will only process your Personal Data if you have given your prior consent. For example, where you have given your consent, we may process Personal Data:

- To improve and innovate our products and services;
- To gain insights into how our vehicles are performing to inform our marketing and advertising campaigns;
- To share the vehicle data with our partners;
- To personalise our communications towards you;
- To support you in case of vehicle warnings.

You can manage your consent(s) preferences at any time through your Account.

8. How can I suspend the use of my vehicle's geolocation?

If you prefer not to have your vehicle's geolocation data used, you can adjust the privacy settings from your vehicle.

By configuring these settings, you can limit the processing of certain types of data, such as geolocation and voice data.

Please be aware that restricting the use of geolocation data will impact all Services that rely on it. Many Services depend, either entirely or partially, on your vehicle's geolocation. Therefore, limiting geolocation data may result in these Services being unavailable, or their quality and accuracy may be reduced. For instance, if geolocation data is restricted, you won't be able to use the Service that helps you locate your vehicle, and we won't be able to track your vehicle following a crash notification.

9. Your privacy settings will remain as you have configured them until you decide to make changes. You can check the current status of your privacy settings at any time through your Account. [General data collection and retention period summary](#)

The below table provides a summary of the Personal Data that we may use in relation with the Services with an explanation on why we use them and how long they are kept.

Purposes	Lawful Basis	Categories of Data	Retention Period
- To create your account	Necessary for us to perform our contract with you	- Account information - Security-related data	- For as long as you have an active Account
- To close inactive account	Our legitimate interest to implement a process of data	- Account information	We will close your Account and delete your Personal Data linked to it, if:

Version : 3
Date : September 2024

Purposes	Lawful Basis	Categories of Data	Retention Period
	minimization with regards to inactive accounts		<ul style="list-style-type: none"> -After Account creation, you have not logged in on your Account for 6 months, or; -Your Account related information indicates that you have a registered a Toyota car and you have not logged in on your Account for 5 years, or; -Your Account related information indicates that you have not registered a Toyota car and you have not logged in on your Account for 2 years.
<ul style="list-style-type: none"> - To (de)activate your subscription to the Services - To provide the Services to you - To handle your queries and complaints - To renew any Service we offer that is about to expire 	Necessary for us to perform our contract with you	<ul style="list-style-type: none"> - Location data - Telematics data - Account information - Billing information - Vehicle & accessory information - HomeCharge information - Voice Data 	<ul style="list-style-type: none"> - Telematics data for 12 months (starting from the date we collected these data). - To handle your queries related HomeCharge Solution, months from date of receipt of your query if the request is closed or until the request is closed, whichever is the longer period. - Where we create scores ¹ as part of the provision of the Services to you (e.g., when we provide Hybrid Coaching when we provide Usage-Based Insurance (UBI) or Full Hybrid Insurance (FHI) calculations), we keep these scores for 1 year starting from the date the score was created.
To comply with a legal obligation (e.g. to ensure fair competition there are laws which require us to	When necessary for us to comply with a legal obligation	<ul style="list-style-type: none"> - Telematic data - Account information - Vehicle information 	We do not store the data specifically for this purpose.

Commented [LF8]: @Charles Cuvelier (TME) Same as another comment, to confirm if billing information is considered to include payment method details and transaction records.

¹ Scores are different from your telematic data and location data because scores are analytical data derived from your telematic data and location data.

Purposes	Lawful Basis	Categories of Data	Retention Period
share certain car-related data with, for example, dealers and repairers)			
To innovate, to improve the existing Services, to create new Services, and to gain insights and analyse data to help meet our sustainability goals.	<ul style="list-style-type: none"> - If you have consented thereto; or - Where this constitutes further processing of your Personal Data and provided it meets the purpose limitation and compatibility test, the processing may be based on the original lawful basis of performance of a contract with you; or - Our legitimate interest to innovate, to improve the Services, to develop new Services and to gain insights to help meet our sustainability goals. 	<ul style="list-style-type: none"> - Location data - Telematic data - Account information - Billing information - Vehicle & accessory information 	We keep the data for a period of up to 10 years from the date we collected the data.
To ensure the confidentiality, integrity and availability of our systems and Services	<ul style="list-style-type: none"> - When necessary for us to comply with a legal obligation - Our legitimate interest to protect the confidentiality, integrity and availability of our systems and Services 	- Security-related data	<p>A period up to 24 months, that may vary by country. We may keep the data longer if:</p> <ul style="list-style-type: none"> - Necessary as part of an ongoing investigation into a cyber security incident; - Necessary for us to conduct audits of the security of our systems, applications or networks.
Where we are legally obliged to collect and retain your Personal Data (e.g. we must retain certain billing information pursuant to tax and accounting laws)	- When necessary for us to comply with a legal obligation	<ul style="list-style-type: none"> - Account information - Billing information - Telematic data - Vehicle & accessory information 	<p>For as long as we are legally obliged to keep the data. The retention requirements vary from one country to the other.</p> <p>For example, in Belgium we are required to keep certain accounting records for 7 years following the end of the relevant fiscal year.</p>
When we are required by law enforcement authorities, regulators or courts to disclose your Personal Data	<ul style="list-style-type: none"> - When necessary for us to comply with a legal obligation - The legitimate interest for us and society in general to honour data disclosure 	<ul style="list-style-type: none"> - Location data - Telematic data - Account information - Billing information - Vehicle & accessory information 	By default, we will not retain data for this purpose, and we will only pass it on as and when requested to by law

Commented [LF9]: @Charles Cuvellier (TME) . Billing information here includes payment method details? Is this the understanding?

Version : 3
Date : September 2024

Purposes	Lawful Basis	Categories of Data	Retention Period
	requests from law enforcement authorities, regulators, or courts	- Security-related data	enforcement authorities, regulators or courts.
Keeping record of your privacy preferences	- Where necessary to comply with our legal obligations under applicable data protection laws - Your and our legitimate interest to adequately manage your privacy preferences	Data relating to your privacy preferences (e.g., date you give your consent; what you consented to; date on which you withdrew your consent; how consent was given (for example from which device); etc.).	We keep the data for up to 10 years after consent was given and for up to 5 years after the consent was withdrawn depending on applicable local laws.
If reasonably necessary in connection with a dispute or an investigation in which we are or may become involved either directly with you or with a third party	- Legitimate interest - When necessary for us to comply with a legal obligation	- Location data - Telematic data - Account information - Billing information - Vehicle & accessory information - Security-related data	We will only retain data for this purpose on a case-by-case basis when the need arises. For this purpose, your data can be kept up to 10 years.
- To send you reminders related to your Toyota car. - To inform you about offers of Toyota products and services which could be relevant for you, for your Toyota car and/or your mobility.	- If you have consented thereto - When we are authorised by law, based on our legitimate interest	- Location data - Telematic data - Account information - Billing information - Vehicle & accessory information	Where applicable, for as long as you have consented to our use of your data for sales and marketing activities or for as long you have an active account, whichever terminates first.

10. Will my Personal Data be transferred to other countries?

Toyota operates globally. Therefore, your Personal Data may be stored and processed by us or our service providers in multiple countries, including countries other than your country of residence or purchase of your vehicle. Your Personal Data may, for example, be transferred to the United Kingdom, Japan or the United States.

If your Personal Data is being transferred to countries located outside of the European Economic Area ("EEA"), we will ensure that appropriate safeguards are taken, such as:

- The transfer falls within the scope of an adequacy decision taken by the European Commission under Article 45 of the GDPR;
- The transfer is governed by the standard data protection contractual clauses, as approved by the European Commission or a data protection authority pursuant to Article 46.2(c) or (d) of

the GDPR. For further information about how transfers of personal data outside of the EEA are regulated, please consult this [page](#) on the international dimension of data protection.

For further information on how we implemented the appropriate safeguards, you can contact us as specified in the section “How can I exercise my privacy rights and contact Toyota?” below.

11. What are my rights in relation to my Personal Data?

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data that we hold about you in the context of the Services. These rights include the following:

- The **right to be informed**: You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal Data and your rights related thereto. This is in part why we are providing you with the information in this Privacy Notice.
- The **right of access**: You have the right to obtain access to your Personal Data. You may wish to access your Personal Data to confirm our use in accordance with applicable data protection laws.
- The **right to rectification**: You are entitled to have your Personal Data rectified if they are inaccurate or incomplete.
- The **right to erasure**: This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your Personal Data where there is no compelling reason for us to keep using it. Please note that this is not an absolute right and exceptions apply.
- The **right to restrict processing**: You have rights to block or prevent further use of your Personal Data. When processing is restricted, we can still store your Personal Data, but our use of your Personal Data will be restricted.
- The **right to data portability**: You have the right to obtain and reuse your Personal Data for your own purposes across different services. For example, if your relationship with Toyota ends, this right enables you to move, copy or transfer your Personal Data easily between our IT systems and those of another service provider, without affecting its usability. Please note that this is not an absolute right and exceptions apply. Also, this right can be applied only in certain circumstances and provided it does not adversely affect others’ rights (for example, it can be applied with regard to the Personal Data you provided to us, which we processed in order to fulfil our contract with you).
- **The right to object to processing**: Where the processing is based on our legitimate interest, you have the right to object to such processing (unless we have a compelling and legitimate reason to continue processing your Personal Data). For example, where we collect and use your Personal Data to develop new Services, and where we are allowed to do so without your prior consent, you have the right to opt-out of such processing by sending an email to [\[NMSCs to update link\]](#)
- The **right to object** at any time to the processing of your Personal Data for **direct marketing** purposes.
- The **right to lodge a complaint**: You have the right to lodge a complaint about the way we handle or process your Personal Data with your national data protection authority. In your country that is [\[NMSC to fill in the name and URL of the national data protection authority of its country\]](#).

Commented [LF10]: [@Charles Cuvelier \(TME\)](#) Should we mention somehow the exception for payment methods info? We cannot give back to the user even if they request Right of Access.

Commented [LF11]: [@Charles Cuvelier \(TME\)](#), with Pay-D system we do anonymization, as it's not possible to delete the account on their side. Must this detail be explicit?

Commented [C(11R2)]: Unless we have a compelling reason to keep using it. I believe this would capture appropriately this use case

Version : 3
Date : September 2024

- The **right not to be subject to automated decision making**: You have the right not to be subject to a decision that is based solely on automated processing (including profiling) and that produces legal effects for you or similarly significantly affects you.
- If our processing of your Personal Data is based specifically on your consent, you have **the right to withdraw** that **consent** at any time. This can be done through your Account.

Please note that you may exercise the abovementioned rights only in relation to the Personal Data we hold about you in the context of the Services.

12. How can I exercise my privacy rights and contact Toyota?

For more information about our use of your Personal Data and to exercise your privacy rights, please contact us as follows:

- you can exercise your right of access, right to data portability, right to erasure and right to object, by clicking on the relevant links in the Platform;
- you can directly rectify your Account-related Personal Data through the Platform and;
- for any other request, or requests that cannot be made via the Platform, please [\[send an email to \[NMSC's DP Contact Point email address\] or click here \[hyperlink that leads to NMSC's DP Contact Point email address\]](#)

We will try to comply with your requests as soon as reasonably practicable and always in accordance with the legally prescribed timeframes. Please note that, if we have doubts about your identity, we may require you to provide us a proof of your identity to, for example, prevent unauthorised access to your Personal Data.

Please note that, if you have requested the erasure of your Personal Data, we may still have to retain certain Personal Data if so required or authorised by law.

13. Changes to this Privacy Notice

Toyota may update this Privacy Notice from time to time, and when we do so, we will re-issue a revised Privacy Notice, and notify you of any changes to the extent required by law.

If you have any questions regarding any changes to this Privacy Notice, please contact us as set out in the section "How can I exercise my privacy rights and contact Toyota?" above.

14. Cookies-and similar technologies

Toyota uses cookies or similar technologies to understand how you use the App, clicks and scrolls across the App by way of example, which once analysed will help us improve or personalize products, content, offers or services on the Platform and Toyota websites.

As part of this activity, we will measure the performance of the App in terms of user engagement and acquisition and assess the simplicity and efficiency of app user journeys and functionalities. We produce anonymized statistics in order to measure behavioural characteristics such as location, mobile app usage and thus we can identify potential areas of improvements and instability issues. Regarding our use of cookies, please specifically consult our [Cookie policy](#).

15. We may share your Personal Data with Authorized Retailers/Repairers

As mentioned in the general section, certain of your requests may be fulfilled using an Authorised Retailer/Repairer and we then may pass your Personal Data to the Authorised Retailer/Repairer of

Version : 3
Date : September 2024

your choice, so that they can process your request and contact you as needed in the framework of your requests. In case you did not make a choice of Authorised Retailer/Repairer, we will select one based on location (the nearest to you based on your postcode, address) or based on the history of your contacts with our network.

All of our Authorised Retailers/Repairers are independent groups or companies. They are instructed that they must have appropriate data security safeguards in place and that they must not use any of your Personal Data for any purpose outside the fulfilment of your specific request to us. The Authorised Retailer/Repairer concerned may separately ask you to provide your name and contact information for other purposes, such as, for example, marketing activities. Such contacts will be made in compliance with applicable data protection law.

[16. Conflicts or Inconsistencies](#)

If there is any conflict or inconsistency between a provision of this Privacy Notice and a provision of the General Privacy Policy, this Privacy Notice will prevail.