

Appendix II : European Connected Vehicles Privacy Policy

This Privacy Policy for Connected Vehicles (“**Privacy Policy**”) applies to the **Personal Data** we process about users of the **Connected Services** through our **Vehicle**, Our **Websites** or **Application** who have signed the **General Conditions** as a **Customer** or who are authorized by a **Customer** to access and use the **Connected Services**.

This Privacy Policy is drafted pursuant Article 13 of the EU Regulation 679/2016 (hereinafter “**GDPR**”) and will help you understand better how we handle your information.

In this document, you will find some examples of how we process **Personal Data**, and **Definitions** referring to more detailed explanations (at the end this Privacy Policy) for the capitalized terms herein. If you would like any clarifications regarding this Privacy Policy or how your data are processed, please send your request to: dataprotectionofficer@stellantis.com.



Who we are

Depending on the **Vehicle** brand you have chosen, the independent **Data Controller** of your **Personal Data** is:

- Stellantis Europe S.p.A., C.so Agnelli 200, 10135 - Turin, Italy; or
- PSA Automobiles SA (Stellantis Auto S.A.S.), 2-10 Boulevard de l'Europe, F-78300 Poissy, France; (singularly “**Car Manufacturer**”, “**we**” or “**us**”).



What data we collect and process

In general, we may collect or receive the following information about you directly from you and third parties, depending on the type of **Connected Services**, and how you access them. You may find further details on the reasons why we process your **Personal Data** in the “Why we collect and process your Data” section below. The provision of your **Personal Data** is always free and without consequences except for the pursue of some purposes.

Registration data and access to the Connected Services

When you register to access the **Connected Services**, we will ask you to enter or confirm some **Personal Data** such as your name, surname, e-mail address, date of birth and mobile phone number, as well as other information such as the answer to a security question and a PIN code, in order to help us establish your identity when accessing services from the **Vehicle Device** or **Our Websites** and **Application**.

Vehicle Data

When using the **Connected Services**, we may collect (also over the air) improved **Vehicle Data**, such as driving data (e.g. location, speed and distances), engine running time and turning off time, if the battery cable is cut, battery diagnostics, movements with the key out, presumed collision, as well as diagnostic data such as, but not limited to, oil and fuel levels, tire pressure, and engine status.

This **Vehicle Data** is linkable to you to the extent that it is associated with a **Unique Identifier** such as the Vehicle Identification Number or VIN, or your **Connected Services** account.

Vehicle Device Data

Through the **Vehicle Device**, we are able to collect and provide information on battery status, on the use of native applications installed on the **Vehicle**, as well as on mobile network connection, such as, for example, when you connect the **Device** to provide the **Vehicle** data connection.

Data collected through the Application

Through the **Application**, we may collect information on the **Device** it is installed on, for example, the **Unique Identifier** and information about your location. The **Application** allows you to check some information (e.g., location), to carry out some actions (e.g., opening the doors) or to set up alerts (e.g., geographical limits/areas) relating to the **Vehicle**.

Information about your location

We collect information about your location in order to provide **Connected Services**. For example, in order to provide roadside assistance we must collect and share the precise **Vehicle** location with roadside assistance service providers. Your location can be determined through:

- the **Vehicle Sensors**;
- the **Device Sensors** when you use the **Application**; and
- the **IP Address**.

You can limit our collection of your **Vehicle**'s location through the **Vehicle Device** settings (“Privacy Mode”) or those of the **Device** or **Application**, as described in the “How to control your Data and manage your choices” section below.

Please note that you cannot refuse the use of Information about your location if this is required to provide **Connected Services** or to protect our interests and those of our customers, as explained below.

Data inferred by your activity

To the extent permissible under applicable data protection law, we may collect further information about you based on your interactions with the **Connected Services**. For example, we can understand your driving style, routes most travelled, places of interest.

In some cases, Information about you is collected and combined through your interaction with **Our Network** and/or **Our Websites** and **Application**.

In some other cases, if you contact us by email, mail, telephone or otherwise regarding the **Vehicles** or request other information, we collect and maintain a record of your contact details, communications, and our responses. If you contact us by telephone, more information will be provided during the call.



Source of Personal Data

During the use of the [Connected Services](#), we may collect data from third parties such as:

- Data relating to drivers other than you. If you permit another driver to drive your [Vehicle](#) and/or access or use your [Connected Services](#) account, then you acknowledge and agree that we may make available and collect data during their use. As we are not aware who is the person using the [Connected Services](#) other than the [Customer](#), all the information collected will be associated to you/your account.
- Data relating to passengers. An example is the case of a presumed collision of the [Vehicle](#), after which the [Connected Services](#) activate an emergency call to us and/or the public emergency services, which could involve the processing of your passengers' data. By way of example, but not limited to, other cases could include a change of ownership, when you purchase a company's fleet, or if you indicate that the driver is not the owner of the [Vehicle](#).

If you provide us with the data of third parties, you are responsible for sharing such information with us and must be legally authorized to do so (i.e. authorized by the third party to share their information, or for any other legitimate reason). You must also fully indemnify us against any complaints, claims or demands for compensation of damages which may arise from the processing of third-party [Personal Data](#) in violation of applicable data protection law and from the processing of your [Personal Data](#) negligently made available by you through the [Connected Services](#).



Why we collect and process your Data

Your Data serves the following purposes:



Ease the collection and correction of your Data

To the extent permissible under applicable data protection law, we use the Data provided by you to us (in particular, the information that you are already a customer of one or more [Car Manufacturers](#)) to update the information that we have about you as an owner of one of our [Vehicles](#). In these cases, we will interrogate our databases to ease the update or to correct the available information we have about you as [Customer](#).

This processing is based on our legitimate interest in keeping up to date the quality of [Personal Data](#) about [Customers](#).



Providing the Connected Services and related support

We use Data to help you connect to and use the [Connected Services](#), including but not limited to emergency calls (e.g. eCall, Help, advanced roadside assistance), the Vehicle Health Report (VHR), change of ownership, and to respond to you requests, suggestions or reports. This purpose also includes optional services that allow you to share your Vehicle Device Data history and functions through the [Application](#). When some [Connected Services](#) chosen by you are not provided directly by us but by our [Commercial Partners](#), we will only provide the Data strictly necessary for providing those services.

This processing is based on the execution of a contractual obligation indicated in the [General Conditions](#) or pre-contractual measures taken at your request.



Sharing Vehicle Data with Car Manufacturer

We may share Vehicle Data collected during the provision of the Connected Services with Stellantis Car Manufacturer to allow the latter to improve Vehicles and Connected Services; to measure the effectiveness of their services and the creation of new services. Vehicle Data are processed as Personal Data and/or as Aggregated Information, thus, not associated with Personal Data relating to you.

This processing is based on our legitimate interest in creating and maintaining Vehicle and services that are genuinely useful to our customers.

The processing can also be performed when you have given your consent.

Once transmitted or collected, your Data may also be used for the following purposes:



Complying with legal and tax obligations

We may use your Data to comply with legal and tax obligations (e.g., product liability etc.), which are the legal basis for such processing of your Data. These obligations may include the communication of certain Data (e.g., Vehicle Data) to public authorities should it be so required by national and/or European legislation (e.g., the European Environment Agency (EEA) pursuant to Regulation (EU) 2021/392) and any recall notices we are required to issue in our capacity as a manufacturer of the [Vehicle](#). If these notices are not required by law in your country, we will send them regardless, as explained in more detail in the "Protecting our interests and your interests" section below.



Detecting anomalies in the Connected Services or the Vehicle

We may use your Data, especially the Vehicle Data and Vehicle Device Data, to detect and (if possible) to avoid anomalies in the [Connected Services](#) or the [Vehicle](#).

This processing is based on the need to provide the [Connected Services](#) in the manner and timeframe indicated in the [General Conditions](#), as well as on our legitimate interest in ensuring the [Vehicle](#) efficiency to the extent possible. You will not receive any communications to this regard, unless in response to your anomaly report.

Protecting our interests and your interests



To the extent permissible under applicable data protection law, we may need to use your Data to detect, react to, and prevent fraudulent and illegal behavior or activity which could compromise your or our security. This purpose includes audits and assessments of our business operations, security controls, financial controls, records and information management program, and otherwise relating to the administration of our general business, accounting, record keeping and legal functions. We will also use your Data to send you communications about the safety of your **Vehicle**/fleet (e.g. recall campaigns, software updates, etc.), even if there is no established legal requirement to this effect in the country you are in. In this regard, please mind that some Vehicle Data (i.e., diagnostic data and VINs without any further association to your person) will be sent to the European Environment Agency (EEA) based on a task carried out in the exercise of official authority vested in us pursuant to Regulation (EU) 2021/392. These are not promotional, but service communications to ensure your safety when using your **Vehicle**. This purpose is based on the legitimate interest in safeguarding our interests and protecting our customers, including you.



How we use your Data (method of processing)

Data collected for the purposes indicated above are processed both manually and via automated processing, through programs and/or algorithms that analyze information such as Data inferred by your activity. Your Data also may be subject to **Combination and/or Crossing**, to the extent permissible under applicable data protection law. For example, this allows us to distinguish the owner from the **Vehicle** data associated with you.



How we may disclose your Data

We disclose your Data with the following list of persons/entities ("**Recipients**"):

- **Persons authorized by us** to perform any of the data-related activities described in this document: our employees and collaborators who have undertaken an obligation of confidentiality and abide by specific rules concerning the processing of your Data;
- **Our Data Processors**: external subjects to whom we delegate some processing activities. For example, security systems providers, accounting and other consultants, data hosting providers, etc. This category also includes **Our Network** and service providers, who help us provide roadside assistance, so they can recognize you as our customer and offer you the same services anywhere in Europe. We have signed agreements with each of our **Data Processors** to ensure that your Data is processed with appropriate safeguards and only under our instruction;
- **System administrators**: our employees or those of **Data Processors** to whom we have delegated the management of our IT systems and are therefore able to access, modify, suspend or limit the processing of your Data. These subjects have been selected, adequately trained and their activities tracked by systems they cannot modify, as provided for by the provisions of the competent Supervisory Authority;
- **Our Commercial Partners**: when some **Connected Services** chosen by you are not provided directly by us but by our **Commercial Partners**, we will only communicate the Data strictly necessary for providing those services. Each of the above carries out the processing as the Independent Data Controller of your Data.
- **Car Manufacturers**: our Car Manufacturers to whom we may share Vehicle Data collected during the provision of the Connected Services in order to improve Vehicles and Connected Services;
- **Law enforcement or any other authority whose provisions are binding for us**: we disclose your Data (including **Vehicle** location) for emergency and public safety purposes, such as where necessary to enable law enforcement, roadside assistance and first responders to locate you after a presumed collision activates an emergency call to rescue services (e.g. eCall), or to enable law enforcement to locate the **Vehicle** if it has been reported stolen. In general, when we have to comply with a judicial order or law or defend ourselves in legal proceedings.



Where your Data is located

We are a global company and the **Connected Services** are available in multiple jurisdictions worldwide. This means that your Data may be stored, accessed, used, processed, and disclosed outside your jurisdiction, including within the European Union, the United States of America, or any other country where our **Data Processors** and sub-processors are located, or where their servers or cloud computing infrastructures may be hosted. We take steps to ensure that the processing of your Data by our Recipients is compliant with the applicable data protection laws, including EU law to which we are subject. Where required by EU data protection law, transfers of your Data to Recipients outside of the EU will be subject to adequate safeguards (such as the relevant EU standard contractual clauses for data transfers between EU and non-EU countries), and/or other legal basis according to the EU legislation. For more information on the adequate safeguards we have implemented with regard to Data that is transferred to third countries, please write to us at: dataprotectionofficer@stellantis.com



How long we retain your Data

Data processed for the purposes indicated above will be kept for the period deemed strictly necessary to fulfil such purposes. Data processed in compliance with the legal obligations to which we are subject is kept for the period required by law. Personal Data processed to protect our interests, and our users' interests are kept until the time provided for by the applicable law to protect our interests. Once the relevant retention period/criterion has expired, your Data is erased pursuant to our retention policy. You can ask us for more information on our data retention criteria and policy by writing us here: dataprotectionofficer@stellantis.com



How to control your Data and manage your choices

At any time, you can ask to:

- **Access your Data (right of access):** depending on your interactions with us, we will provide the Data we have related to you, such as your name, age, e-mail address and preferences.
- **Exercise your right to portability of your Personal Data (right of data portability):** where applicable, we will provide you with an interoperable file containing the Data we have about you.
- **Correct your Data (right to rectification):** for example, you can ask us to modify your e-mail address or telephone number if they are incorrect;
- **Limit the processing of your Data (right to restriction of processing):** for example, when you think that the processing of your Data is unlawful or that processing based on our legitimate interest is not appropriate;
- **Delete your Data (right to erasure):** for example, if you do not want us to keep your data and there is no other reason for keeping it (e.g. if you are no longer the owner of the **Vehicle** and do not want to remain in touch with us);
- **Object the processing activities (right to object)**
- **Withdraw your consent (right to withdrawal)**

You can exercise any of the above rights or express any concern or make a complaint regarding our use of your Data directly at: <https://privacyportal.stellantis.com>.



At any time, you may also:

- contact our Data Protection Officer (DPO), here dataprotectionofficer@stellantis.com
- contact the competent Supervisory Authority, here you can find the list of all the Supervisory Authorities by country https://edpb.europa.eu/about-edpb/board/members_en
- review and update much of the Data that you have submitted by logging into your account and updating your profile information. Please note that we may maintain copies of information that you have updated, modified, or deleted, as permitted, in our business records and in the normal course of our business operations, as permitted or required by applicable law. You may also access Vehicle Health Reports, and Vehicle location through your Services account.
- stop remote transmission and collection of Vehicle Data from your Vehicle, except for emergency and roadside services and Wi-Fi-enabled services. Certain in-vehicle safety, diagnostic and other systems may continue to generate and store performance, safety and diagnostic information, which may be accessed by Our Network and others who service your Vehicle.
- Unsubscribe from free trial for and access to certain third-party subscription-based service, including SiriusXM Radio and Wi-Fi hotspot. If you subscribe to these third-party services at the end of your free trial, you must contact these **Commercial Partners** directly if you would like to subsequently cancel your third-party subscription.

How we protect your Data

We take reasonable precautions from a physical, technological and organizational point of view to prevent the loss, misuse, or modification of Data under our control. For example:

- We ensure that your Data is only accessed and used by, transferred or disclosed to Recipients that need to have access to such Data.
- We also limit the amount of Data accessible, transferred or disclosed to Recipients to only what is necessary to fulfill the purposes or specific tasks performed by the Recipient.
- The computers and servers where your Data is stored are kept in a secure environment, are password-controlled with limited access, and have industry standard firewalls and anti-virus software installed.
- Paper copies of any documents containing your Data (if any) are kept in a secure environment as well.
- We destroy paper copies of documents containing your Data that is no longer needed.
- When destroying Data recorded and stored in the form of electronic files that is no longer needed, we make sure that a technical method (for example, low level format) ensures that the records cannot be reproduced.
- Laptops, USB keys, mobile phones and other electronic wireless devices used by our employees who have access to your Data are protected. We encourage employees not to store your Data on such devices unless it is reasonably necessary for them to do so to perform a specific task as outlined in this Privacy Policy.
- We train our employees to comply with this Privacy Policy and conduct monitoring activities to ensure ongoing compliance and to determine the effectiveness of our privacy management practices.
- Any **Data Processor** that we use is contractually required to maintain and protect your Data using measures that are substantially similar to those set out in this Privacy Policy or required under applicable data protection law.

In case required by the applicable legislation, if a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Data transmitted, stored or otherwise processed, will be notified to you and to the competent data protection authority as required (for example, unless Data is unintelligible to any person or the breach is unlikely to result in a risk to your rights and freedoms and those of others).

Customers are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to the **Connected Services** and their account. In order

	<p>to protect you and your data, we may suspend your use of any of the Connected Services, without notice, pending an investigation, if any security issue arises. Access to and use of password protected and/or secure areas of any of the Connected Services or your associated account are restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution or civil action.</p>
<p>What this Privacy Policy does not cover</p>	<p>This Privacy Policy explains and covers processing that we carry out as Data Controller. This Privacy Policy does not cover processing carried out by subjects other than us, including and in particular:</p> <ul style="list-style-type: none"> - processing carried out by Our Network; - processing carried out by Car Manufacturers as independent Data Controllers; - processing carried out by other Commercial Partners as independent Data Controllers of certain additional Connected Services. - processing carried out by national emergency number operators in case of emergency calls (eCall); - processing carried out by regulatory authorities, law enforcement or other judicial or government entities. <p>Regarding these cases, we are not responsible for any processing of your Data that is not covered by this Privacy Policy.</p>
<p>Usage of data for other purposes</p>	<p>If we should need to process your Data differently or for purposes other than those indicated herein, you will receive specific notice before such processing begins.</p>
<p>Changes to the Privacy Policy</p>	<p>We reserve the right to adapt and/or change this Privacy Policy at any time. We will inform you of any substantial adaptations/changes.</p>
<p>License</p>	<p>The icons illustrated in this Notice are "Data Protection Icons" by Maastricht University European Centre on Privacy and Cybersecurity (ECPC) CC BY 4.0.</p>
<p>Definitions</p>	<p>Aggregated information: refers to statistical information about you that does not contain your Personal Data.</p> <p>Application: means any mobile application for Connected Services.</p> <p>Brand: means Fiat, Fiat Professional, Alfa Romeo, Lancia, Jeep, Abarth, Peugeot, Citroën, DS Automobiles, Vauxhall or Opel (as applicable).</p> <p>Car Manufacturers: singularly or collectively refers to the following entities acting as manufacturer of Vehicles: Stellantis Europe S.p.A. Corso Agnelli 200, 10135 Turin, Italy; Stellantis Auto S.A.S., 2-10 Boulevard de l'Europe, F-78300 Poissy, France; Opel Automobile GmbH, Bahnhofplatz, D-65423 Rüsselsheim am Main, Germany. For the purpose of this Privacy Policy the Car Manufacturer is the one producing a specific Vehicle brand currently as follows: Stellantis Europe S.p.A. for Fiat, Fiat Professional, Alfa Romeo, Lancia, Abarth and Jeep; Stellantis Auto S.A.S. for Peugeot, Citroën and DS automobiles; Opel Automobile GmbH for Opel and Vauxhall.</p> <p>Combination and/or Crossing: this is the set of fully automated and non-automated operations which we combine with the Data inferred by your activity, the Data provided by you to provide the Connected Services.</p> <p>Commercial Partners: means third-party entities to whom we communicate the Data strictly necessary for providing Connected Services that you have required but that are not provided directly by us (eg. Internet connection for the Vehicle). We will only communicate the Data strictly necessary for providing those services. Each of the above carries out the processing as the Independent Data Controller of your Data.</p> <p>Connected Services: refers to the set of services described in the General Conditions of the Data Controller, as well as the standard and optional services, if activated.</p> <p>Customer: refers to the person who signed the General Conditions for the Connected Services.</p> <p>Data Controller: refers to the legal person, public authority, service or other entity which, individually or collectively determines the purposes and means for processing your Personal Data. In other cases, it is preceded by the word "independent" (e.g. "Independent Data controller") to indicate that your Personal Data is processed by a subject other than the Data Controller.</p> <p>Data Processor: refers to an entity that we engage to process your Personal Data solely on behalf of and pursuant to the written instructions of the Data Controller.</p> <p>Device Sensors: depending on your Device, these are sensors such as accelerometers, gyroscopes, Bluetooth, Wi-fi and GPS which one way or another share the information they collect through the Device and therefore through the Application. If enabled by the Device settings, these allow us to obtain Information about your location.</p> <p>Device: means the electronic Device (e.g. smartphone, smartwatch) on which you downloaded the Application and/or with which you access the Connected Services.</p> <p>General Conditions: mean the "General conditions of connectivity-based services" you signed</p>

when you activated the Connected Services, which is always available on Our Websites and Application.

Our Network: these are retailers and/or dealers and/or repairers with whom the Data Controller has signed commercial agreements for the sale of its vehicles and fleets, and who provide assistance services.

Our Websites: include our social network pages and some sections of Our Network's websites where this privacy policy is available.

Personal Data: means any information relating to an identified or identifiable natural person. Examples include, e-mail address (if it refers to one or more aspects of an individual), name and surname, an ID document, a mobile phone number or Unique Identifiers such as a Vehicle Identification Number (VIN). For your convenience, we will collectively indicate all Personal Data mentioned so far as "Data".

Unique Identifiers: means information that uniquely identifies you or through which you may be identified. On a Vehicle, the Unique Identifiers are the license plate number and Vehicle Identification Number (VIN).

Vehicle Data: means any technical, diagnostic and real-world data that is possible to collect via the Vehicle Device installed on the Vehicle (e.g., location, speed and distances, engine running time and turning off time; if the battery cable is cut, battery diagnostics, movements with the key out, presumed collision, as well as diagnostic data such as, but not limited to oil and fuel levels, tire pressure and engine status).

Vehicle Device: means singularly or collectively a device capable to collect Vehicle Data and the telematic Device (and associated sim card) installed on the Vehicle and better described in the General Conditions.

Vehicle Sensors: these are sensors such as Wi-fi and GPS which in one way or another share the information they collect through the Vehicle Device.

Vehicle: refers to a vehicle of a brand of Stellantis Group.
