FordPass

FordPass Privacy and Cookie Policy

Version: 0.7

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The FordPass App (the "**App**") collects your personal information. See https://www.fordpass.com/content/ford_com/fp_app/all_eu/eu-data-controllers.html for details of the identity and contact details of the Ford company ("**we**", "**our**") that is responsible for your information (this will depend on your country of residence).

This FordPass Privacy and Cookie Policy (the "**Policy**") will help you understand what personal information we collect through the App and from the vehicle(s) you connect to it, why we collect it and what we do with it. It also explains your rights and how you can contact us with any requests or concerns.

The App will offer different features depending on whether you use it:

- Either in conjunction with Ford's mobile apps with Sync or without connecting it to a vehicle; or
- With a vehicle equipped with FordPass Connect. You can find out more about FordPass Connect and your vehicle's connectivity features on your local Ford website, on Fordconnected.com and in your vehicle's owners' manual.

1. Using FordPass with Ford's mobile apps with Sync or without c
onnecting it to a vehicle, or

2. Using FordPass with FordPass Connect

1. Using FordPass, with Ford's mobile apps with Sync or without connecting it to a vehicle

In brief:

We collect information about you and the vehicle(s) you choose to connect to the App and use it to provide you with the services offered through the App (the "**Services**"), including our 'MyPerks' rewards program, which is an essential part of the Services.

We also combine the information we collect with other information we hold about you, and use it for other purposes, such as offering you products and services we think will interest you. You can update your marketing communication preferences at any time via the 'Manage my Data' section of the App.

You have the right to object to our using your personal information in certain circumstances.

If you agree, we collect and use the GPS geo-location of your device and vehicle to provide you with the Services and for other

purposes. You can revoke your consent to this at any time via the 'Manage my Data' section of the App and via ‘Settings’ on the in-vehicle screens.

The App uses technologies similar to cookies to provide the Services, to create pseudonymous profiles about how the App is used, and with your consent, for advertising purposes. You can revoke your consent to our use of these technologies for advertising purposes at any time via the 'Manage my Data' section of the App.

We may transfer your data outside the European Economic Area. We may also share it with affiliates, dealers, service providers and in certain other situations.

In more detail:

Information we Collect and Use through the App:

***Service-related data*:** Depending on the Services you use, we may collect and use the following information:

- Move: We collect the information you provide through the App, together with information about the vehicle(s) you connect to the App (see vehicle data below) in order to provide you with the Services and as otherwise described in this Policy. For example, we use vehicle identification number ("VIN") and mileage information in order to allow you to connect with your Ford dealer and schedule services; your GPS geo-location of the mobile device you use to access the App (with your consent) to allow you to locate and book various methods of transportation, and your vehicle data to allow you to check the status of your vehicle.
- Find: We collect the address and any other information you provide in the App. If you consent, we also collect and use your GPS geo-location from the mobile device you use to access the App. We process and use this data to provide you with the Services and as

otherwise described in this Policy. This includes showing you nearby fuel, transportation options, points of interest, parking, and Ford dealers, and providing you with relevant directions.

- Guides: If you call a Ford Guide or communicate with them through live chat, we collect information about your contact with the Ford Guide including calls, emails, messages and live chat. We process and use this data for quality and training purposes, to provide you with the Services and as otherwise described in this Policy. If you consent, Ford Guides will be able to view your recent use of the App so that they can better assist you.
- Account Management: You may give us information about yourself by filling in forms in the App, for example when you download the App, request an account or subscribe to any of the Services. The information you give may include your email, user ID, password, title, first and last name, telephone number, home address, and payment information ("**Account Information**"). We may also collect mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network information. We process and use this data to create and manage your account, to provide you with the Services, and as otherwise described in this Policy. We may combine this data with other information you have previously provided to us (not only through the App), or that we have collected from public sources or third party service providers, in order to ensure your information is kept up-to-date.

The App also allows you to connect to your Ford Credit Account Manager and manage your Ford Credit Account. If you do so, FCE Bank plc ("**Ford Credit**") will request additional personal information in order to verify your identity and allow access to your Ford Credit Account. Ford Credit will use this personal information as described in your Ford Credit agreement.

- In addition, the App may enable you to purchase products and services such as van hire. Some of these products and/or services are provided by our partners who will collect additional personal information from you in order to fulfil your requests. Our partners will use the personal information they collect as they describe in their privacy statements or as they explain when you provide your personal information.

Vehicle data: You may give us information about your vehicle by filling in forms in the App. This includes VIN, registration number and mileage information. With your consent, we collect and use the GPS geo-location of your mobile device and vehicle. We may also collect information about the vehicle(s) you connect to the App, such as the hardware model and part numbers, status of vehicle systems (e.g., fuel status), vehicle diagnostics, odometer, and other information about how the vehicle is performing, and driving characteristics, such as speed, use of accelerator, brakes, steering, seat belts, and other similar information about how the vehicle is used. More information can be found on the in-vehicle screens. We process and use this data to provide you with the Services, and as otherwise described in this Policy.

MyPerks data: If you create a Ford Pass account, we will use data about how you use the Services (for example if you reserve a parking spot) together with your Account Information to provide you with rewards ("**Perks**"). This is an integral part of the Services.

Use Profiles: We collect pseudonymous profiles of your use of the App, including information such as when and for how long you use particular Services and features, for purposes of marketing, market research and for improving our services. Where we collect these profiles on the basis of consent, you can revoke your consent at any time via the 'Marketing Options' secti on of the App.

Technical information about you and your device: Each time you use the App, it may automatically access from or store to your device technical information including mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network

information, preference settings and details of your use of the App and the Services that you access. We may also collect information about how the App is used and how it is performing including if it crashes.

Location data: If you consent, some of the Services use real time Global Positioning System (GPS) technology to determine your current location from your device, for example in order to find your nearest dealer, direct you to your chosen dealer or identify nearby parking opportunities. You can withdraw your consent at any time via the 'Manage my Data' section of the App, but this may limit or prevent the use of certain Services.

If you use the HERE Live Traffic functionality on a vehicle connected to the App, we collect the vehicle's VIN for authentication purposes, and then share the vehicle's location, direction and speed in pseudonymous form with our third party service provider HERE Global B.V. ("**HERE**"). HERE will use this information in accordance with its privacy policy available at: https://legal.here.com/privacy/policy/gb/

You may give us Account Information when you register for Hourly Van Hour with Hertz 24/7 in the App. We process and use this data to enable you to register with Hertz 24/7 and to book services. If you consent to the collection and use of GPS geo-location, we will use this when you search for a service location. We share your Hourly Van Hire Account Information and booking information with Hertz. Hertz will use the information in accordance with its privacy policy available at https://www.hertz.co.uk/rentacar/privacypolicy/index.jsp?targetPage=privacyPolicyView.jsp

You may choose not to provide certain personal information (such as not entering a VIN to connect your vehicle to the App),

but this may limit or prevent use of certain Services (for example, if you do not enter a VIN, we will be unable to send you recall notices via the App

How do we use your information?

We use the personal information we collect about you through the App and from the vehicle(s) that you connect to it to provide you with the Services, including those described above.

We also use it for other legitimate purposes, such as to:

- Provide you with great functionality and services;
- Allow you to control certain vehicle features;
- Fulfil your requests and deal with your enquiries;
- Manage and improve our business and our relationship with you;
- Assess the quality of the services we and dealers provide, and the services our suppliers provide to us or on our behalf; send you marketing material in line with your communications preferences;
- Personalize your experience and the marketing you receive;
- Troubleshoot problems;
- Conduct research and develop new and improved products, services, and business and marketing strategies;
- Comply with legal requirements or requests from public authorities;
- Protect or defend our or another's rights or property;
- Protect individuals' personal safety; and
- Detect, prevent, or otherwise address fraud, security, safety, or privacy issues.

We, Ford Motor Company and other Ford Motor Company Group companies worldwide may, where permitted by law, combine and, using automated decision making processes, analyse your Account Information/the information we collect as a result of your use of the App and the Services with other information we

hold about you and other customers to assist with the purposes outlined above. This could include, for example, analysing vehicle diagnostic information, conducting recalls, evaluating the effectiveness of our marketing and customer service, conducting market analysis and identifying products or services which may be of interest to you, and contacting you to tell you about such products and services. For further information about the other categories of information we may hold about you, please see the privacy policies we have given to you in connection with other Ford products and services you have received from us, for example on the local Ford website and Fordconnected.com.

We would also like to make sure the communications we send you and our interactions with you are as relevant to you as possible. As a result, from time to time, we may use information about you collected from public sources (e.g. online resources) and from third parties (such as our service providers, like web hosting providers, analytics providers, or advertising services) to help us determine what Ford products and services you might be interested in. For example, analytics providers and advertising services may analyse the information they collect from online and other sources to provide us with information about your demographics and interests – such as inferences about your age range and the types of products or services that may interest you. We may then send you information about those products and services in accordance with your communications preferences. Our customer relationship centre may also use the information we hold about you if you contact them with a question or query. If you do not wish for us to obtain information about you from third parties for the purposes described in this paragraph, please contact us (see How to Contact Us section).

You can update your marketing communication preferences at

You can update your marketing communication preferences at any time via the 'Marketing Options' section of the App.

We may be required by law to collect certain personal information. We may also be required to collect your personal information as a result of a contractual relationship with you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

In some limited circumstances, the automated decisions we take may have a legal or similar effect on you. We will only make these kinds of automated decisions about you where:

- The decisions are necessary for performing or entering into a contract with you;
- The decisions are authorised by law; or
- You give your consent to us carrying out automated decision-making.

You can contact us to request further information about automated decision-making, and in some circumstances object to our use of automated decision-making, or request that an automated decision is reviewed by a human.

We may use and share non-personal (i.e. anonymous) information for any purpose.

On what lawful grounds do we use your information?

There are several lawful grounds on which we may use your information:

- As described above, we need to use certain information about you in order to perform our contract with you by providing you with the Services you have requested, for example to enable your use of the Ford Guides, Move, and Find features; to allow you to control certain vehicle features; to fulfil requests you have made in the

certain vehicle features; to fulfil requests you have made in the App; to troubleshoot problems; to provide you with MyPerks; and to send you transactional communications;

- We often have a legitimate interest in processing your information for certain purposes, for example to provide you with great functionality and services; to personalize your experience and the marketing you receive; to predict which Ford products or services could be of interest to you; to manage and improve our business and our relationship with you; to assess the quality of the services we and dealers provide, and the services our suppliers provide to us or on our behalf; to develop new and improved products, services, and business and marketing strategies; to conduct research; to protect or defend our or another's rights or property; or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- In certain situations, we will ask you for your consent to use your information for specific purposes, for example to use your location. Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. Please see the 'Your rights...' section of this Policy for more details;
- In certain circumstances, we may need to use your information where we believe it necessary to comply with a legal obligation;
- In certain circumstances, we may need to use your information where we believe it necessary to protect someone's safety or vital interests; and
- In certain circumstances, we may need to use your information for certain purposes which are in the public interest.

Where Your Information is Stored

Your personal information is stored locally on your mobile device, and on servers operated by us and our service providers. Your personal information will be treated in accordance with UK law concerning data protection and may be transferred within

the European Economic Area ("**EEA**"), as well as to countries outside the EEA (including to the USA). The countries to which we transfer your personal information may not be regarded by the European Commission as ensuring an adequate level of protection for personal information. As a result, when we transfer your personal information outside the EEA we will put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal information is adequately protected, irrespective of the country to which it is transferred. These safeguards may include obtaining contractual assurances from any third party given access to your personal information that your personal information will be protected by standards which are equivalent to those that protect your personal information when it is in the EEA. If you would like to know more about how we protect your personal information when it is transferred outside the EEA, or to obtain a copy of the safeguards we put in place to protect your personal information when it is transferred, please contact us (see How to Contact Us section).

How We Share Information:

We may share personal information obtained through the App and from the vehicle(s) you connect to it:

- With authorized dealers and our affiliates. 'Our affiliates' means the group of companies related to us by common control or ownership. A list of companies within the Company Group can be found here: https://www.fordpass.com/content/ford_com/fp_app/all_eu/eu-data-controllers.html;
- With our partners. For example:
    - We share your location, direction and speed in pseudonymous form with HERE, our real-time traffic information provider. HERE will use this information in accordance with its privacy

policy available at: https://legal.here.com/privacy/policy/gb/

- You can use the App to hire a van. If you do so, your Account Information will be shared with Hertz Europe Limited ("**Hertz**") along with the additional information you provide to them, including scanned images of your payment card and driving license, to fulfil your request. You can find out how Hertz will use your personal information in their privacy policy here: https://www.hertz.co.uk/rentacar/privacypolicy/index.jsp?targetPage=privacyPolicyView.jsp

- With companies or other organisations that we have engaged to provide services on our behalf such as subscription management providers, web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers;
- With professional advisors;
- Where we believe this is necessary in order to comply with a legal requirement or requests from public authorities; to protect or defend our or another's rights or property; to protect individuals' personal safety; or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues; or
- With any new owner if we sell some or all of our business.

How long do we keep your information?

We only keep your information in identifiable form for as long as is necessary for the purposes set out in this Policy. This generally means holding the information for as long as one of the following apply:

- Your information is reasonably required in order to provide the Services to you;
- Your information is reasonably required in order to satisfy the purpose for which you submitted or we collected the information;
- Your information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the

relevant limitation period in your jurisdiction); or

- We are otherwise required to keep your information by applicable laws or regulations.

Cookie-like technologies active on the App

What are cookie-like technologies?

Cookie-like technologies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Apps often use similar technologies to cookies in order to remember you, provide you with the content you requested, or for product improvement by tracking how the app is being used.

The benefits of cookie-like technologies

These technologies are extremely useful, because they can make the experience more user-friendly when you come back to an app you've visited several times previously. Provided you use the same device and browser as before, they can, for example, remember your preferences, help us to know how you use our app, and make the content shown more relevant to your interests and needs.

These technologies are used in the App for the following purposes:

- Strictly necessary purposes: These technologies are required for the basic site functionality and to provide the Services.
- Performance purposes: These technologies allow us to improve our App functionality and conduct market research by tracking usage. We use Adobe Analytics to create pseudonymous profiles about

how the App is used. You may object to the creation of such pseudonymous profiles. We also use Aptelligent to collect technical information from your device when the App crashes in order to understand what went wrong.

- Advertising purposes: These technologies allow us to assess the success of our advertising campaigns. We also use them to personalize the marketing you receive. You can opt-out of our use of advertising technologies at any time via the 'Manage my Data' page in the App.
    - On iOS devices, you can also limit the use of these technologies for advertising purposes by clicking "Privacy"-"Advertising" in your iOS settings and sliding the "Limit Ad Tracking" switch to "on";
    - On Android-based mobile devices, you can also deactivate personalized advertising via "Settings/Account/Google/Ads" by ticking the "Opt out" box.
- Guides purposes: If you contact a Ford Guide, and you agree, we use these technologies to enable the Ford Guides to see your recent use of the App. This makes it easier for them to help you.
- Third-party purposes**:** If you use the HERE Live Traffic functionality within your vehicle via the App, our third-party service provider, HERE Global B.V., may also deploy cookies on your device. For more information, please see the cookie policy for HERE available at https://legal.here.com/privacy/policy/gb/.

Push notifications

The App may use your preference settings from your device to provide you with push notifications, including notifications relating to the Services. For example, the App may send push notifications about the status of the vehicle(s) you have connected to it. If you disable Push notifications in your device settings, you will still be able to access the Services via the App.

Children's Privacy

The App does not knowingly collect personal information from children under 16 years of age.

Your Rights, and How to Contact Us

You have the right as an individual to find out what information we hold about you and for what purposes, as well as to make corrections if necessary. You also have the right in some circumstances to object to our continuing to process your personal data, or to ask us to delete, restrict the use of your information. In some circumstances you can also request that your personal information is provided to you in a commonly used electronic format so that you can share it with other organisations (this is often referred to as the right to 'data portability').

We encourage you to contact us to update or correct your personal information if it changes or if the personal information we hold about you is inaccurate.

If you are unhappy about how we use your information, we hope that in the first instance you will let us know so that we are able to address your concerns. However, you are also entitled to lodge a complaint with your local data protection authority.

If you have questions or concerns regarding our use of your information, or would like to exercise any of your rights, you can call a FordPass Guide or write to your local Data Controller here.

You can also contact our Data Protection Officer directly here:

dpeurope@ford.com

Security of Your Information

We use appropriate systems, policies, procedures, and technology to protect and maintain the security and accuracy of your information.

Other websites

The App may contain links to other apps or websites which are outside our control and are not covered by this Policy. If you access other websites using the links provided, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policies, which may differ from ours.

Privacy and Cookie Policy Effective Date and Revisions

This Policy may be updated in order to reflect any changes to the App, our privacy practices and use of your information, or applicable law.

If we change this Policy, we will notify you of the changes. Where the changes 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).

Consents for Device Location and Cookie-Like Technologies

This is the wording of the consent which you may have given for

This is the wording of the consent which you may have given for device location and cookie-like technologies used for marketing personalisation:

Cookie-like technology

With your consent, we may also use this data to personalise the advertising you receive. You can withdraw consent to the use of cookie-like technologies for advertising personalisation at any time for your device. Withdrawing consent may limit or prevent use of certain features of the app.

Share Device Location

In order to allow you to use certain features of the app, we would like to collect, use and share information about the location of your mobile device.

2. Using FordPass with FordPass Connect

In brief:

We collect information about you and the vehicle(s) you choose to connect to the App and use it to provide you with the services offered through the App (the "**Services**"), including our 'MyPerks' rewards program, which is an essential part of the Services. If you connect your vehicle(s) to the App, some of the Services require us to use your vehicle's internet connection to collect information from your vehicle.

If you connect more than one account to a vehicle, please be aware that:

- The location of the vehicle will be displayed to the users of every account connected to the vehicle; and
- All users of those accounts will have access to the Services

- All users of those accounts will have access to the Services, including Services which allow the vehicle to be remotely started (where applicable), locked and unlocked, and which show information about the vehicle's status (for example, its fuel level).

Similarly, if you are driving a vehicle with the App connected to it, the user(s) of the App will have access to the vehicle's location, and to Services which allow the vehicle to be remotely started (where applicable), locked and unlocked and which show information about the vehicle's status (for example, its fuel level).

You can stop data being shared between the vehicle and the App or permanently disconnect a vehicle from the App by referring to the in-vehicle Connectivity Settings and the knowledge articles in the FAQs of the Accounts section of the App. If you disconnect a vehicle from the App, or stop data being shared between the vehicle and the App using the in-vehicle controls, you may not be able to use some Services. For example, if you stop sharing GPS geo-location data, Live Traffic will be unable to provide up-to-date traffic data and if you stop sharing vehicle data and remote control, you will be unable to use remote lock and unlock.

We combine the information we collect with other information we hold about you, and use it for other purposes, such as offering you products and services we think will interest you. You can update your marketing communication preferences at any time via the 'Marketing Options' section of the App.

You have the right to object to our using your personal information in certain circumstances.

If you agree, we collect and use the GPS geo-location of your device and the vehicle(s) you connect to the App to provide you with the Services and for other purposes. You can revoke your

consent to this at any time via the 'Manage my Data' section of the App and your in-vehicle settings.

The App uses technologies similar to cookies to provide the Services, to create pseudonymous profiles about how the App is used, and with your consent, for advertising purposes. You can revoke your consent to our use of these technologies for advertising purposes at any time via the 'Manage my Data' section of the App.

We may transfer your data outside the European Economic Area. We may also share it with affiliates, dealers, service providers and in certain other situations.

If you let others drive the vehicle(s) you connect to the App, please tell them about how you use the App and how to prevent the sharing of data between the App and the vehicle(s) connected to it, and explain that a copy of this Policy is available on your local Ford website or at Fordconnected.com

In more detail:

Information we Collect and Use through the App:

***Service-related data*: ** Depending on the Services you use, we may collect and use the following information:

- Move: We collect the information you provide through the App, together with information about vehicle(s) you connect to the App (see vehicle data below) in order to provide you with the Services and as otherwise described in this Policy. For example, we use vehicle identification number ("VIN") and mileage information in order to allow you to connect with your Ford dealer and schedule services; the GPS geo-location of the device you use to access the App and the vehicle(s) connected to the App (with your consent) to allow you to locate and book various methods of transportation,

and data from your vehicle to allow you to control certain features of your vehicle remotely and check the status of your vehicle.

- Find: We collect the address and any other information you provide in the App. If you consent, we also collect and use your GPS geo-location from the mobile device you use to access the App and the vehicle(s) you connect to the App. We process and use this data to provide you with the Services and as otherwise described in this Policy. This includes locating your vehicle and displaying its location in the App, showing you nearby fuel, transportation options, points of interest, parking, and Ford dealers, and providing you with relevant directions.
- Guides: If you call a Ford Guide or communicate with them through live chat, we collect information about your contact with the Ford Guide including calls, emails, messages and live chat. We process and use this data for quality and training purposes, to provide you with the Services and as otherwise described in this Policy. If you consent, Ford Guides will be able to view your recent use of the App so that they can better assist you.
- Account Management: You may give us information about yourself by filling in forms in the App, for example when you download the App, request an account or subscribe to any of the Services. The information you give may include your email, user ID, password, title, first and last name, telephone number, home address, and payment information ("**Account Information**"). We may also collect mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network information. We process and use this data to create and manage your account, to provide you with the Services, and as otherwise described in this Policy. We may combine this data with other information you have previously provided to us (not only through the App), or that we have collected from public sources or third party service providers, in order to ensure your information is kept up-to-date.

The App also allows you to connect to your Ford Credit Account Manager and manage your Ford Credit Account. If you do so, FCE Bank plc ("**Ford Credit**") will request additional personal information in order to verify your identity and allow access to your Ford Credit Account. Ford Credit will use this personal information as described in your Ford Credit agreement.

In addition, the App may enable you to purchase products and services such as van hire. Some of these products and/or services are provided by our partners who will collect additional personal information from you in order to fulfil your requests. Our partners will use the personal information they collect as they describe in their privacy statements or as they explain when you provide your personal information.

Vehicle data: You may give us information about your vehicle by filling in forms in the App. This includes VIN, registration number and mileage information. With your consent, we collect and use the GPS geo-location of your mobile device and vehicle. We may also collect information about the vehicle(s) you connect to the App, such as the hardware model and part numbers, status of vehicle systems (e.g., fluid levels, tyre pressure, engine, in-vehicle Wi-Fi and locks), vehicle diagnostics, odometer, and other information about how the vehicle is performing, and driving characteristics, such as speed, use of accelerator, brakes, steering, seat belts, and other similar information about how the vehicle is used. We process and use this data to provide you with the Services, and as otherwise described in this Policy. You can choose what data is sent from the vehicle(s) connected to the App through your in-vehicle settings. If you restrict the data which is sent from your vehicle, this may limit or prevent the use of certain Services.

MyPerks data: If you create a Ford Pass account, we will use data about how you use the Services (for example if you reserve a parking spot) together with your Account Information to provide you with rewards ("**Perks**"). This is an integral part of the Services.

Use Profiles: We collect pseudonymous profiles of your use of

the App, including information such as when and for how long you use particular Services and features, for purposes of marketing, market research and for improving our services. Where we collect these profiles on the basis of consent, you can revoke your consent at any time via the 'Marketing Options' section of the App.

Technical information about you and your device: Each time you use the App, it may automatically access from or store to your device technical information including mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network information, preference settings and details of your use of the App and the Services that you access. We may also collect information about how the App is used and how it is performing including if it crashes.

Location data: If you consent, some of the Services use real time Global Positioning System (GPS) technology to determine your current location from your device, for example in order to find your nearest dealer, direct you to your chosen dealer or identify nearby parking opportunities. Some of the Services also involve collecting your location directly from your vehicle, for example in order to allow you to locate your vehicle using your device and to display this location in the App. You can withdraw your consent at any time via the 'Manage my Data' section of the App or your in-vehicle settings, but this may limit or prevent the use of certain Services.

If you use the HERE Live Traffic functionality on a vehicle connected to the App, we collect the vehicle's VIN for authentication purposes, and then share the vehicle's location, direction and speed in pseudonymous form with our third party service provider HERE Global B.V. ("**HERE**"). HERE will use this

information in accordance with its privacy policy available at: https://legal.here.com/privacy/policy/gb/

You may give us Account Information when you register for Hourly Van Hour with Hertz 24/7 in the App. We process and use this data to enable you to register with Hertz 24/7 and to book services. If you consent to the collection and use of GPS geo-location, we will use this when you search for a service location. We share your Hourly Van Hire Account Information and booking information with Hertz. Hertz will use the information in accordance with its privacy policy available at https://www.hertz.co.uk/rentacar/privacypolicy/index.jsp?targetPage=privacyPolicyView.jsp

You may choose not to provide certain personal information, but this may limit or prevent use of certain Services (for example, if you do not connect a vehicle, you will be unable to use the lock and unlock feature).

How do we use your information?

We use the personal information we collect about you through the App and from the vehicle(s) that you connect to it to provide you with the Services, including those described above. We also use it for other legitimate purposes, such as to:

- Provide you with great functionality and services;
- Allow you to control certain vehicle features;
- Fulfil your requests and deal with your enquiries;
- Manage and improve our business and our relationship with you;
- Assess the quality of the services we and dealers provide, and the services our suppliers provide to us or on our behalf;
- Send you marketing material in line with your communications preferences;

preferences;

- Personalize your experience and the marketing you receive;
- Troubleshoot problems;
- Conduct research and develop new and improved products, services, and business and marketing strategies;
- Comply with legal requirements or requests from public authorities;
- Protect or defend our or another's rights or property;
- Protect individuals' personal safety; and
- Detect, prevent, or otherwise address fraud, security, safety, or privacy issues.

We, Ford Motor Company and other Ford Motor Company Group companies worldwide may, where permitted by law, combine and, using automated decision making processes, analyse your Account Information/the information we collect as a result of your use of the App and the Services with other information we hold about you and other customers to assist with the purposes outlined above. This could include, for example, analysing vehicle diagnostic information, conducting recalls, evaluating the effectiveness of our marketing and customer service, conducting market analysis and identifying products or services which may be of interest to you, and contacting you to tell you about such products and services. For further information about the other categories of information we may hold about you, please see the privacy policies we have given to you in connection with other Ford products and services you have received from us, for example on the local Ford website and Fordconnected.com.

We would also like to make sure the communications we send you and our interactions with you are as relevant to you as possible. As a result, from time to time, we may use information about you collected from public sources (e.g. online resources) and from third parties (such as our service providers, like web hosting providers, analytics providers, ad networks, advertising agencies) to

hosting providers, analytics providers or advertising services) to help us determine what Ford products and services you might be interested in. For example, analytics providers and advertising services may analyse the information they collect from online and other sources to provide us with information about your demographics and interests – such as inferences about your age range and the types of products or services that may interest you. We may then send you information about those products and services in accordance with your communications preferences. Our FordPass Guides may also use the information we hold about you if you contact them with a question or query. If you do not wish for us to obtain information about you from third parties for the purposes described in this paragraph, please contact us (see How to Contact Us section).

You can update your marketing communication preferences at any time via the 'Marketing Options' section of the App.

We may be required by law to collect certain personal information. We may also be required to collect your personal information as a result of a contractual relationship with you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

In some limited circumstances, the automated decisions we take may have a legal or similar effect on you. We will only make these kinds of automated decisions about you where:

- The decisions are necessary for performing or entering into a contract with you;
- The decisions are authorised by law; or
- You give your consent to us carrying out automated decision-making.

You can contact us to request further information about automated decision-making, and in some circumstances object

automated decision-making, and in some circumstances object to our use of automated decision-making, or request that an automated decision is reviewed by a human.

We may use and share non-personal (i.e. anonymous) information for any purpose.

On what lawful grounds do we use your information?

There are several lawful grounds on which we may use your information:

- As described above, we need to use certain information about you in order to perform our contract with you by providing you with the Services you have requested, for example to enable your use of the Ford Guides, Move, and Find features; to allow you to control certain vehicle features; to fulfil requests you have made in the App; to troubleshoot problems; to provide you with MyPerks; and to send you transactional communications;
- We often have a legitimate interest in processing your information for certain purposes, for example to provide you with great functionality and services; to personalize your experience and the marketing you receive; to predict which Ford products or services could be of interest to you; to manage and improve our business and our relationship with you; to assess the quality of the services we and dealers provide, and the services our suppliers provide to us or on our behalf; to develop new and improved products, services, and business and marketing strategies; to conduct research; to protect or defend our or another's rights or property; or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- In certain situations, we will ask you for your consent to use your information for specific purposes, for example to use your location. Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. Please see the

'Your rights...' section of this Policy for more details;

- In certain circumstances, we may need to use your information where we believe it necessary to comply with a legal obligation;
- In certain circumstances, we may need to use your information where we believe it necessary to protect someone's safety or vital interests; and
- In certain circumstances, we may need to use your information for certain purposes which are in the public interest.

Where Your Information is Stored

Your personal information is stored locally on your mobile device, and on servers operated by us and our service providers. Your personal information will be treated in accordance with UK law concerning data protection and may be transferred within the European Economic Area ("**EEA**"), as well as to countries outside the EEA (including to the USA). The countries to which we transfer your personal information may not be regarded by the European Commission as ensuring an adequate level of protection for personal information. As a result, when we transfer your personal information outside the EEA we will put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal information is adequately protected, irrespective of the country to which it is transferred. These safeguards may include obtaining contractual assurances from any third party given access to your personal information that your personal information will be protected by standards which are equivalent to those that protect your personal information when it is in the EEA. If you would like to know more about how we protect your personal information when it is transferred outside the EEA, or to obtain a copy of the safeguards we put in place to protect your personal information when it is transferred, please contact us (see How

to Contact Us section).

How We Share Information:

If you connect more than one account to a vehicle, please be aware that:

- The location of the vehicle will be displayed to the users of every account connected to the vehicle; and
- All users of those accounts will have access to the Services, including Services which allow the vehicle to be remotely started (where applicable), locked and unlocked, and which show information about the vehicle's status (for example, its fuel level).

Similarly, if you are driving a vehicle with the App connected to it, the user(s) of the App will have access to the vehicle's location, and to Services which allow the vehicle to be remotely started (where applicable), locked and unlocked and which show information about the vehicle's status (for example, its fuel level).

You can stop data being shared between the vehicle and the App or permanently disconnect a vehicle from the App by referring to the in-vehicle Connectivity Settings and the knowledge articles in the FAQs of the Accounts section of the App. If you disconnect a vehicle from the App, or stop data being shared between the vehicle and the App using the in-vehicle controls, you may not be able to use some Services. For example, if you stop sharing GPS geo-location data, Live Traffic will be unable to provide up-to-date traffic data and if you stop sharing vehicle data and remote control, you will be unable to use remote lock and unlock.

If you chose to connect the App to a vehicle which has already been connected to by another App user, your name and the fact

been connected to by another App user, your name and the fact that you have requested this connection will be shared, via the App, with the App user who first connected the vehicle. This user will be given the opportunity to allow or refuse your request to connect to the vehicle.

Some of the Services require us to share your personal information with our partners. For example:

- We share your location, direction and speed in pseudonymous form with HERE, our real-time traffic information provider. HERE will use this information in accordance with its privacy policy available at: https://legal.here.com/privacy/policy/gb/
- You can also choose to activate your vehicle's Wi-Fi Hotspot by creating an account with our network provider, Vodafone Global Enterprise Limited ("**Vodafone**"). To enable the activation of your Wi-Fi Hotspot account, we will send certain information, including your vehicle VIN and vehicle SIM identifier to Vodafone. You can find out how Vodafone use your personal information in their privacy policy. Although Vodafone will provide the Wi-Fi Hotspot and manage your subscription, Vodafone will inform us when certain data use thresholds are met, so that we can show you your data plan usage in the App or if you call our FordPass Guides.
- You can use the App to hire a van. If you do so, your Account Information will be shared with Hertz Europe Limited ("**Hertz**") along with the additional information you provide to them, including scanned images of your payment card and driving license, to fulfil your request. You can find out how Hertz will use your personal information in their privacy policy here: https://www.hertz.co.uk/rentacar/privacypolicy/index.jsp?targetPage=privacyPolicyView.jsp

We may also share personal information obtained through the App and from the vehicle(s) you connect to it:

- With authorized dealers and our affiliates. 'Our affiliates' means the group of companies related to us by common control or ownership. A list of companies within the Company Group can be found here.
- With companies or other organisations that we have engaged to provide services on our behalf such as subscription management providers, web-hosting companies, mailing vendors, analytics

providers, web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers;

- With professional advisors;
- Where we believe this is necessary in order to comply with a legal requirement or requests from public authorities; to protect or defend our or another's rights or property; to protect individuals' personal safety; or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues; or
- With any new owner if we sell some or all of our business.

How long do we keep your information?

We only keep your information in identifiable form for as long as is necessary for the purposes set out in this Policy. This generally means holding the information for as long as one of the following apply:

- Your information is reasonably required in order to provide the Services to you;
- Your information is reasonably required in order to satisfy the purpose for which you submitted or we collected the information;
- Your information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant limitation period in your jurisdiction); or
- We are otherwise required to keep your information by applicable laws or regulations.

Cookie-like technologies active on the App

What are cookie-like technologies?

Cookie-like technologies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Apps often use similar technologies to cookies in order to remember you, provide you with the content you requested, or for product improvement by tracking how the app is being used.

The benefits of cookie-like technologies

These technologies are extremely useful, because they can make the experience more user-friendly when you come back to an app you've visited several times previously. Provided you use the same device and browser as before, they can, for example, remember your preferences, help us to know how you use our app, and make the content shown more relevant to your interests and needs.

These technologies are used in the App for the following purposes:

- Strictly necessary purposes: These technologies are required for the basic site functionality and to provide the Services.
- Performance purposes: These technologies allow us to improve our App functionality and conduct market research by tracking usage. We use Adobe Analytics to create pseudonymous profiles about how the App is used. You may object to the creation of such pseudonymous profiles. We also use Aptelligent to collect technical information from your device when the App crashes in order to understand what went wrong.
- Advertising purposes: These technologies allow us to assess the success of our advertising campaigns. We also use them to personalize the marketing you receive. You can opt-out of our use of advertising technologies at any time via the 'Manage my Data' page in the App.
    - On iOS devices, you can also limit the use of these technologies for advertising purposes by clicking "Privacy"-"Advertising" in your iOS settings and sliding the "Limit Ad

Tracking" switch to "on";

- On Android-based mobile devices, you can also deactivate personalized advertising via "Settings/Account/Google/Ads" by ticking the "Opt out" box.

- Guides purposes: If you contact a Ford Guide, and you agree, we use these technologies to enable the Ford Guides to see your recent use of the App. This makes it easier for them to help you.
- Third-party purposes: If you use the HERE Live Traffic functionality within your vehicle via the App, our third-party service provider, HERE Global B.V., may also deploy cookies on your device. For more information, please see the cookie policy for HERE available at https://legal.here.com/privacy/policy/gb/.

Push notifications

The App may use your preference settings from your device to provide you with push notifications, including notifications relating to the Services. For example, the App may send push notifications about the status of the vehicle(s) you have connected to it. If you disable Push notifications in your device settings, you will still be able to access the Services via the App.

Children's Privacy

The App does not knowingly collect personal information from children under 16 years of age.

Your Rights, and How to Contact Us

You have the right as an individual to find out what information we hold about you and for what purposes, as well as to make corrections if necessary. You also have the right in some

circumstances to object to our continuing to process your personal data, or to ask us to delete, restrict the use of your information. In some circumstances you can also request that your personal information is provided to you in a commonly used electronic format so that you can share it with other organisations (this is often referred to as the right to 'data portability').

We encourage you to contact us to update or correct your personal information if it changes or if the personal information we hold about you is inaccurate.

If you are unhappy about how we use your information, we hope that in the first instance you will let us know so that we are able to address your concerns. However, you are also entitled to lodge a complaint with your local data protection authority.

If you have questions or concerns regarding our use of your information, or would like to exercise any of your rights, you can call a FordPass Guide or write to your local Data Controller here.

You can also contact our Data Protection Officer directly here:

dpeurope@ford.com

Security of Your Information

We use appropriate systems, policies, procedures, and technology to protect and maintain the security and accuracy of your information.

Other websites

The App may contain links to other apps or websites which are outside our control and are not covered by this Policy. If you access other websites using the links provided, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policies, which may differ from ours.

Privacy and Cookie Policy Effective Date and Revisions

This Policy may be updated in order to reflect any changes to the App, our privacy practices and use of your information, or applicable law.

If we change this Policy, we will notify you of the changes. Where the changes 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).

Consents for Device Location and Cookie-Like Technologies

This is the wording of the consent which you may have given for device location and cookie-like technologies used for marketing personalisation:

Cookie-like technology

With your consent, we may also use this data to personalise the advertising you receive. You can withdraw consent to the use of cookie-like technologies for advertising personalisation at any time for your device. Withdrawing consent may limit or prevent use of certain features of the app.

use of certain features of the app.

Share Device Location

In order to allow you to use certain features of the app, we would like to collect, use and share information about the location of your mobile device.