

HONDA MOTOR EUROPE LIMITED

MY HONDA – SUPPLEMENTAL PRIVACY NOTICE (UK)

This My Honda - Supplemental Privacy Notice (“**Privacy Notice**”) explains how Honda Motor Europe Limited, trading as Honda UK (“**Honda**”, “**we**” or “**us**”) processes your personal data when you use the My Honda mobile phone application (the “**App**”). The App provides some telematics/connectivity features when used in combination with a telematics device (the “**Dongle**”) connected to your Honda vehicle. Together, the App and Dongle are referred to as the “**My Honda Package**”.

This Privacy Notice supplements the [Honda Customer Online Content Privacy Notice](#), which sets out in full the ways in which Honda processes your personal data when you visit a Honda website, download and use a Honda app, or otherwise contact Honda in relation to its websites and apps. The Honda Customer Online Content Privacy Notice also describes your data protection rights in relation to the processing activities described in this Privacy Notice.

The purpose of this Privacy Notice is to draw your attention to any processing activities which relate specifically to the My Honda Package, and to provide additional details which may not be covered by the Honda Customer Online Content Privacy Notice.

What personal data we collect

When you install a Dongle in your Honda vehicle and download and use the My Honda App, we will collect and process the following data:

- **Contact details:** such as your name and telephone number;
- **User account details:** such as your PIN (should you chose to provide it);
- **Vehicle information:** such as your Vehicle Identification Number (VIN), vehicle model, and model year;
- **Vehicle performance information:** such as energy efficiency, mileage, type pressure, oil levels, battery status, last date of service and other vehicle health data;
- **Mobile device information:** such as details of the mobile device to which the subscription is linked via the App (e.g. device phone number, and operating system);
- **Financial information:** such as your bank details and other financial information that are required when you activate or renew your subscription (these details will be collected by us or by your authorised Honda dealer at the time of ordering your subscription);
- **Location information:** GPS data to determine the location of your vehicle as extracted from a connected telematics device (Dongle);
- **Trip information:** such as your speed of travel, average speed, distance travelled and parking duration;
- **Driving style:** such as your daily and weekly score for strong breaking, strong acceleration and minutes during which you exceeded 80mph; and
- **Emergency information:** alerts as to an impact suffered by your Honda vehicle which results in an airbag deployment.

If you add information about your family and friends to your App user account (including their telephone numbers), you must inform them before providing such information to us.

Why we collect, use and store this personal data

Where you have given consent

- to access information stored on your device to improve your My Honda customer experience; and
- to carry out **direct marketing** (either by email, post, phone, sms, directly through the App or by other means).

Where necessary to perform or offer services which you request as part of the My Honda Package subscription

- to allow the Dongle to **access your location** data and to send this to your My Honda App in order to enable the App functionality. For example, enabling:
 - you to "**geo-fence**" your vehicle and be notified if your vehicle should travel outside the "virtual fenced" area;
 - you to **share your location** with Honda or third parties, such as roadside assistance;
 - **emergency services** or **roadside assistance** to locate you and/or contact you in the event of an incident (including, for example, the deployment of your vehicle's airbag);
 - to **analyse any recent trips** taken in your Honda vehicle; and
 - to enable you to **locate nearby Honda dealers** and to contact them via the App.
- to inform you of the **health of your vehicle**, including issues related to your vehicle's engine, oil level, tyre pressure and battery life;
- to notify you when your vehicle exceeds any **self-set speed limit**; and
- to **book a test drive and/or servicing** of your Honda vehicle.

Where necessary for Honda's legitimate business interests and where our interests are not overridden by your data protection rights

- to assist with **customer enquiries** or **complaints** in relation to the My Honda Package.

Further information in relation to Honda's legitimate business interest can be provided on request.

Where necessary to comply with a legal obligation, to protect Honda's legitimate interests and legal rights and to cooperate with police investigations where our interests are not overridden by your data protection rights

- to respond to legal claims (including disclosure of information in connection with a legal process of litigation)
- to cooperate with police investigations involving Honda vehicles.

We may also convert personal data into **anonymous** data and use it (normally on an aggregated statistical basis) for research and analysis to improve Honda products (including the My Honda Package) and to develop new vehicle features.

How we share your personal data

Please see the Honda Customer Online Content Privacy Policy for full details of the third parties with whom we share your personal data including Honda group companies; Honda authorised dealers and repairers; companies providing services under contract; and other organisations.

- **App Administration:** The App is administered on behalf of Honda by Bright Box Europe SA whose registered office is in Switzerland and its affiliate Bright Box Hungary Kft (together "**Bright Box**").
- **Roadside Assistance and Impact Alerts:** These services are coordinated by Bosch Sicherheitssysteme GmbH t/a Bosch Service Solutions ("**Bosch**"). In the UK, Bosch works together with the Automobile Association Developments Limited t/a AA Breakdown Services. Your personal

data will only be transferred to these third parties where their assistance is required: your personal data will not be provided to them as a matter of course.

- **Customer contact centre:** My Honda Package support is provided by the Honda Customer Call Centre, which is operated by SYNEX-Concentrix UK Limited. The Call Centre is located in Bulgaria.
- **Cloud infrastructure:** The App uses Microsoft Azure cloud based infrastructure which is hosted by Microsoft Ireland Operations Limited, in the Republic of Ireland.

Your choices and rights

You have certain rights in relation to your personal data, including the right to object to our use of it in some circumstances. For more information on your rights or how we use personal data, please consult our [Honda Customer Online Content Privacy Notice](#).

Changing settings via your mobile device

You may change your App settings at any time to: (a) switch off mobile data; and (c) turn off notifications.

Changing data collection via your Dongle

Your Dongle collects GPS location data, vehicle sensor data and vehicle status information. In order to prevent data from being collected and stored by your Dongle, you will need to disconnect your Dongle.

Please note that for the period during which your Dongle is disconnected from your registered vehicle, we will not be able to provide telematics services including safety critical functions such as Impact Alert for your car.

Data Retention

Honda will retain your personal data for as long as necessary to fulfil the purposes outlined in this Privacy Notice. This means that we will retain your personal data for as long as you **retain a My Honda subscription** or, where you have provided consent for Honda to process your data (e.g. for direct marketing), **until you withdraw your consent**.

Longer retention periods may apply to the extent **required by law** or in the event of a **legal claim**. In such circumstances, the relevant data shall be respectively retained as required by law or for the duration of the claim.

We will keep anonymised data for longer periods for the purpose of research and analysis to improve the My Honda Package and for new vehicle development purposes.

Updates to this Privacy Notice

This Supplemental Privacy Notice may be updated periodically. We will update the date at the top of this Supplemental Privacy Notice accordingly and encourage you to check for changes to this Privacy Notice, which will be available on the App.

Contact us

The data controller for your personal data processed pursuant to the My Honda Package is Honda Motor Europe Limited, Cain Road, Bracknell, Berkshire, RG12 1HL.

If you have questions about this Supplemental Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact us at info.uk.car@honda-eu.com.