

18 February 2019

**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 the personal data of:

1. Honda customers who subscribe to the **My Honda Package** – consisting of the My Honda mobile phone application (the “**App**”) and a telematics device installed in their Honda vehicle (“**Dongle**”), to which the App connects (“**Connected Users**”);
2. Honda customers who download the App and are permitted by a Connected User to access, via the App, telematics/connectivity data from the Connected User’s My Honda Package (“**Connected Guests**”); and
3. Honda customers who download and use the App, without installing a Dongle (“**App only Users**”).

References in this Privacy Notice to “**you**” and “**your**” shall be deemed to include Connected Users, Connected Guests and App only Users.

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 your use of the My Honda Package (in full or in part), and to provide additional details which may not be covered by the Honda Customer Online Content Privacy Notice.

**What personal data we collect**

Connected Users

When Connected Users subscribe to the My Honda Package, we will collect and process the following data:

- **User profile details:** such as the Connected User’s name and telephone number;
- **User account details:** such as the Connected User’s PIN (should they chose to provide it);
- **Vehicle ownership information:** such as the Connected User’s vehicle registration number and country of purchase;
- **Vehicle information:** such as the Connected User’s Vehicle Identification Number (VIN), vehicle model, and model year;
- **Vehicle performance information:** such as energy efficiency, mileage, tyre pressure, oil levels, fuel level, temperature, battery status, last date of service and other vehicle health data;
- **Vehicle status information:** information regarding whether the vehicle is (un)locked, headlights are on/off, seatbelts are on/off;
- **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 the Connected User’s bank details and other financial information that are required when the Connected User activates or renews their subscription (these details will be collected by us or by an authorised Honda dealer at the time of ordering a subscription);

- **Location information:** GPS data to determine the location of the Connected User's vehicle as extracted from a connected telematics device (Dongle), including if the Connected User's vehicle is stolen or towed;
- **Trip information:** such as the Connected User's speed of travel, average speed, distance travelled, travel duration and parking duration;
- **Driving style:** such as the Connected User's daily and weekly score for strong braking, strong acceleration and minutes during which the Connected User exceeded 80mph; and
- **Emergency information:** alerts as to an impact suffered by the Connected User's Honda vehicle which results in an airbag deployment.

#### Connected Guest

In order to establish a Connected Guest, Connected Users will need to provide Honda with their Connected Guest's telephone number via the App. Connected Users must inform Connected Guests that their telephone number will be shared with Honda prior to submitting this data.

When Connected Guests download the App and connect to a Connected User's My Honda Package, we will collect and process the following data:

- **User profile details:** such as the Connected Guest's name and telephone number;
- **User account details:** such as the Connected Guest's PIN (should they chose to provide it);
- **Location (city);** and
- **Mobile device information:** such as details of the mobile device to which the App subscription is linked (e.g. device phone number, and operating system).

To the extent that the Connected Guest utilises the Connected User's vehicle (to which a Dongle is connected), we will collect and process the relevant vehicle data as specified above (under Connected User), excluding financial information and vehicle ownership information.

#### App only Users

When App only Users download the App (without installing a Dongle), they will be invited to create a user profile in order to personalise their usage experience. It is not mandatory to create a user profile in order to download and use App basic features. When App only Users create a user profile, we will collect and process their:

- **User profile details:** such as the App only User's name and telephone number;
- **Location (city);** and
- **Mobile device information:** such as details of the mobile device to which the App subscription is linked (e.g. device phone number, and operating system).

#### **Why we collect, use and store this personal data**

##### Where you have given consent

- to access information stored on your mobile device to improve your My Honda customer experience;
- to send push notifications about Honda news; and
- to send push notifications with special offers regarding Honda vehicles.

##### Where necessary to perform or offer services which you request

- to enable the App to be tailored to your preferences, for example, by listing the contact details of Dealers located in the city identified in your user profile;
- to **book a test drive and/or servicing** of your Honda vehicle;

*(For Connected Users only:)*

- 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; and
- to notify you when your vehicle exceeds any **self-set speed limit**.

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;

*(For Connected Users only:)*

- from time to time, we will confirm your ownership of the vehicle to which the Dongle is connected in order to ensure that we are legally permitted to process data collected by the Dongle and to share this with you (and a Connected Guest, if appropriate) via the App. If you are not the registered owner of the Connected Vehicle, we will disconnect your service.

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 legal rights and to cooperate with police investigations

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

Where we have anonymised your data

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**

Personal data from My Honda is shared with Honda group companies, including with Honda Motor Co., Ltd. In Japan, and with authorised dealers and repairers as necessary for the purposes described above. Please see the Honda Customer Online Content Privacy Policy for full details of the Honda group companies; Honda authorised dealers and repairers; the companies providing services under contract to Honda; and other organisations.

Third parties with whom we share data specifically relating to the My Honda Package

- **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**").
- **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.

- **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. Connected User personal data will only be transferred to these third parties if the Connected User is entitled to receive roadside assistance and where assistance is required: personal data will not be provided to them as a matter of course. **Your Connected Guests** (where you choose to share it) Connected Users have the ability to enable family and friends to access information from their My Honda Package, including, vehicle information, vehicle performance information, location information, trip information and driving style.

### **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 and how to exercise them, please consult our consult the [Honda Customer Online Content Privacy Notice](#).

#### Changing the data we collect via your mobile device

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

#### Changing the data we collect via your Dongle (applicable to Connected Users only)

The 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, Connected Users will need to disconnect the Dongle.

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

#### Changing access rights for Connected Guest (applicable to Connected Users only)

Connected Users can:

- (a) prevent Connected Guests from viewing trip history at any time by switching the function on/off; and
- (b) disconnect Connected Guests at any time via the app

### **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 App subscription** or, where you have provided consent for Honda to process your data (e.g. for direct marketing), **until you withdraw your consent**, whichever is earlier.

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 Privacy Notice may be updated periodically. We will update the date at the top of this 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 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](mailto:info.uk.car@honda-eu.com).