



Privacy Policy

(<https://businesspartnerhub.vodafone.com>)

In this policy, we explain how we collect, use, share and protect your personal information when you use our products and services. When you use our products and services we collect information about you and our privacy policy explains:

- a) what information we may collect.
- b) User's Rights;
- c) how information we collect will be used.
- d) when we may use your details to contact you.

References to "we", "our" and "us" in this policy mean **Vodafone Automotive** in the name of the related legal entity operating in each country we are present.

Whenever you provide personal information to us we are legally required to use such personal information in line with local and EU legislation.

Where you give us information on behalf of someone else, you confirm that you have provided them with the information set out in this policy and that they have not objected to or withheld the use of their personal information in the ways described in this policy.

Please search for the red titles to navigate faster between paragraphs.

How we operate: Nature of Data Processing & Ownership

Vodafone Business Partner Hub (following referenced as "VBPH") is as a central repository for handling contracts and vehicle's device activations; there are several business contexts into which contracts and devices are organized, that determines roles and responsibilities about privacy, and users logging into Business Partner Hub portal will be profiled to see only information related to specific context and/or business customer, as follows:

Aftermarket context - Personal data visible by users logging into VBPH and profiled for Aftermarket context are under the responsibility of Vodafone Automotive, which acts as Data Controller. Users enabled to login are either Vodafone' Automotive's employees or employees of Dealers handling contracts and device activation, and end-user's details are segregated to be visible only to corresponding authorized Dealer's personnel. Personal data associated to login profile (full name, email address) are handled by Vodafone Automotive as Controller for the sole purpose of allowing access to VBPH and can be accessed/modified/deleted upon request of either employee or Dealer's legal representative.

Requests can be addressed to our SPOC teams in each Vodafone's reference country (for UK: registration-uk.telematics@vodafone.com – for Italy : clienti.telematics@vodafone.com - for Spain: cacmotor.telematics@vodafone.com - for France: technique.telematics@vodafone.com). For any privacy related information please address your request to privacy.automotive@vodafone.com

Fleet context - Personal data visible by users logging into VBPH and profiled for Fleet context are under responsibility of the corresponding Fleet company (acting as Data Controller). Users enabled to login are Vodafone's authorized employees which are profiled to see only pertinent fleet companies' user data

OE context - Personal data visible by users logging into VBPH and profiled for OE context are under responsibility of Data Controller as indicated by corresponding contract case by case. Users enabled to login are Vodafone's authorized employees which are profiled to see only pertinent fleet companies' user data.

We process your personal information based on:

The basis of processing the personal data is subject to the role Vodafone is playing in providing the services in the context of VBPH. (Please refer to the above section)

- The **performance of your contract** or to enter into the contract and to take action on your requests/customer orders.
- **Vodafone's legitimate business interests**, for example, fraud prevention, maintaining the security of our network and services, direct marketing, and the improvement of our services. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing.
- **Compliance with a mandatory legal obligation**, including for example accounting and tax requirements and regulations in relation to services, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict usage of your data, which control the scope of legal assistance to be provided.
- **Consent you provide** where Vodafone does not rely on another legal basis. Consent may be withdrawn at any time. When you give your consent, you will be given details on how to change your mind.

We will collect your personal information when you, for example:

- Buy or use any of our products and services
- Use our network or other Vodafone products and services
- Register for a specific product or service
- Subscribe to newsletters, alerts or other services from us



- Contact us through various channels, or ask for information about a product or service
- Take part in a competition, prize draw, event or survey
- Have given permission to other companies to share information about you
- Where your information is publicly available
- Are the customer of a business that we acquire

We also collect information from certain organizations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers.

We'll also get information about how you use our products and services, such as:

- The level of service that you receive – for example, network or service faults and other events that may affect our network services or other services.
- Details of your use of the specific services or products, for example: every time you call the SOC, a record is kept.

How we collect information about you

Based on the role Vodafone is playing in the context of VBPH as mentioned under section “**How we operate: Nature of Data Processing & Ownership**” We collect personal information about:

End-customers, for the provision of services. The communication of the end-customer's personal data from the dealer to Vodafone Automotive shall only take place upon the end customer's request for the provision of an activation or an extended activation of the services. We also collect personal information directly from the employees of the dealers/installers, at the time of their registration into the VBPH.

How we use your personal information

We will use your personal information for the following purposes: (Disclaimer: it is subject to the role VFA plays as mentioned above under “how we operate”)

Processing your order and providing you with your products and services

- To process the products and services you've bought from us, install equipment or deliver equipment to you, and keep you updated with the progress of your order.
- To provide the relevant product or service to you. This includes other services not included in your agreement with us (PayPal, for example and when used), services that use information about where you are, and to contact with you messages about changes to the products or services.

Billing and customer care

- To bill you for using our products and services, or to take the appropriate amount of credit from you.
- Contact you if the billing information you provided us with is about to expire or we're not able to take payment.
- To respond to any questions or concerns you may have about our network, products, or services.

Service messages

- We will contact you with customer service messages to keep you updated with current information about products and services you've taken. For example, changes to our terms and conditions or service interruptions.

How we share your personal information

Where applicable, we share information about you with:

- Companies in the Vodafone Group
- Partners, suppliers or agents involved in delivering the products and services you've ordered or used or for infrastructure maintenance
- Companies who are engaged to perform services for, or on behalf of Vodafone
- Law enforcement agencies, government bodies, regulatory organizations, courts or other public authorities if we have to, or are authorized to by law
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement
- We will release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.
- We also may need to release your information to comply with our legal obligation to respond to the authorities' lawful demands. Your personal data shall only be provided when we in good faith believe we are obliged to do so in accordance with the law and pursuant to an exhaustive evaluation of all legal requirements.

The Types of Personal Information We Collect About You

Customer Account Data (Basic Personal Details): such as name, surname, address, customer, mobile number, email address, customer order number and order details.

Dealer/Installer's Basic Personal Details: Name, Surname, Company Name (Dealer/Installer), Company Address, Phone Number



(company/personal), Email Address (work), VAT reference, VFA Region for the purpose of service registration and service provision.

Vehicle Details: Vehicle Brand, Device Serial Number, Vehicle Registration Details (plate Number, registration date), Vin Number for the purpose of creating customer orders.

Authentication Information: such as the user name and password, IP address needed to log into Vodafone Business Partner Hub.

Cookies: please refer to the “**Cookie Policy**” in this website.

Where We Process Information About You

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are employed, including countries outside of the United Kingdom and the European Economic Area (EEA). If we send personal information about you to a country that is not in the United Kingdom and the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information. Please contact your Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section “Your rights & how to contact us”

How long we keep information about you

We'll store your information for as long as we have to by law in accordance with our Data Retention Policy and HR Data Retention Guidelines. If there's no legal requirement, we'll only store it for as long as we need to. Generally, this means that we will retain your information for as long as you are using the service, and after the service contract ends, we retain some of that information for long as is necessary to fulfil the purposes for which it was collected as prescribed by the law.

The retention periods for the storage of personal data are also subject to the role VFA plays (as described in the section “How we operate; nature of processing”

How we protect your personal information

Vodafone is committed to protecting your personal information. We apply strong security and privacy measures to protect your personal information from unauthorized access, use, loss, disclosure or destruction. For example, we encrypt your personal information when it is transmitted, and we store it in a controlled environment with limited access. Our dedicated security and privacy teams conduct assessments on our products, services and operations to ensure our privacy and security policies are implemented. Our suppliers and others who process personal information on our behalf are expected to comply with our high standards. Vodafone employees and approved third parties who need access to personal information are subject to internal policies, strict confidentiality obligations and training. We monitor the implementation of these internal policies. Failure to comply with our policies may lead to investigation and possible disciplinary action up to and including summary dismissal. Vodafone complies with applicable data protection laws, including applicable data breach notification laws.

International Data Transfers

We may need to transfer your information to other Vodafone Group companies or service providers in countries outside the European Economic Area (EEA). The EEA consists of countries in the European Union, Switzerland, Iceland, Liechtenstein, and Norway: they are considered to have equivalent laws when it comes to data protection and privacy. This kind of data transfer may happen if our servers (i.e., where we store data) or our suppliers and service providers are based outside the EEA, or if you use our services and products while visiting countries outside this area.

If Vodafone sends your information to a country that is not in the EEA, we will make sure that your information is properly protected. We will always ensure to conduct a transfer impact assessment and that there is a proper legal agreement that covers the data transfer. In addition, if the country is not considered to have laws that are equivalent to EU data protection standards then we will implement additional technical security and organisational safeguards such as asking the third party to enter into a legal agreement that reflects those standards.

Your personal data is stored in our Vodafone Group Data centre in Milan, Italy

Your rights & how to contact us

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please contact our Customer Services team or use the dedicated address privacy.automotive@vodafone.com / DPO : Thomas Born

Right to access personal data - You have the right to make a request for a copy of the personal data that Vodafone holds about you. To make this request as an individual or an authorized third party please send an email to the above-mentioned email address.

Right to correct personal data – You have the right to correct information held about you if it's not accurate. If the information we hold about you is inaccurate or needs to be updated, please use the above-mentioned email address.

Right to data portability - You have the right to be able to take with you the personal data you provided to us in certain circumstances. In order to do this, please use the above-mentioned email address.

Right to object to use of personal data - You have the right, in certain circumstances, to object to Vodafone processing your personal information. For more information or to exercise this right, please use the above-mentioned email address.

Right to restrict use of your data - If you feel data, we hold on you is inaccurate, or you believe we shouldn't be processing your data,



please use the above-mentioned email address.

Right to erasure - Vodafone strives to only process and retain your data for as long as we need to. In certain circumstances you have the right to request that we erase personal data of yours that we hold. If you feel that we are retaining your data longer than we need, it is worth first checking that your contract with Vodafone has been terminated, which you can do with Customer Services. If your contract with Vodafone has been terminated, we may still have lawful grounds to process your personal data. For more information on retention periods, please contact privacy.automotive@vodafone.com.

How to lodge a complaint?

If you want to contact us about any of your rights or complain about how we use your information, please use the dedicated email address. We'll do our best to help but if you're still unhappy, you can contact your local data protection regulator – please find your by checking your country at https://edpb.europa.eu/about-edpb/about-edpb/members_en

History of modifications

Date	Version	Description	Approved by
10/10/2024	1.0	First editing	Legal, Privacy