



Privacy Policy

Version: 02

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I. General Information

1. Scope of this Privacy Policy

This policy ("**Privacy Policy**") applies to the collection, storage, use and processing of personal data (i.e., personal information for the purposes of New Zealand's Privacy Act 2020 ("**Privacy Act**")) through Mazda group companies ("**Mazda**"), including Mazda Motors of New Zealand Limited (company number 84794) ("**Mazda NZ**"), and its business partners as further outlined below:

- when making use of your Mazda 6e and Mazda CX-6econnected vehicle and related services and features ("**Features**", see Part II);
- when subscribing to our App for the Mazda 6e or the Mazda CX-6e ("**App**", see Part III) and related Features and services offered through the App ("**Services**") via your Mazda vehicle to you ("**User**", "**you**" or "**your**"); and
- when processing personal data collected through the Services for quality, service and security related purposes (see Part IV).

We take your privacy very seriously and will process your personal data only in accordance with applicable data protection law, including the Privacy Act and the Privacy Act's Information Privacy Principles ("**IPPs**").

The implementation of new technologies or the introduction of new Features and Services may require future changes of this Privacy Policy which we may make at any time. In the event of a change, we will notify you (for example, by way of a pop-up prompt in the App) in order to enable you to get the latest version of our Privacy Policy. The latest, as well as each prior version, of this Privacy Policy are available on the App and at: www.mazda.co.nz/digital-services-and-apps/mazda6e-legal.

2. Controller for the processing of personal data

The responsible data controller for the personal data collected, stored, used and processed in connection with the processing activities described in this Privacy Policy differs depending on the relevant processing activity, Feature or Service provided and is explained in Parts II–IV.

Mazda, in particular, Mazda NZ and Mazda Motor Corporation (a Japanese legal entity with the commercial register number 2400-01-036223 and the official company address 3-1 shinchi, Fuchu-cho, Aki-gun, Hiroshima 730.8670 Japan) ("**MC**"), and external service providers, are involved in various data collection and processing operations.

For New Zealand Mazda vehicle owners utilising the App, Mazda NZ determines the specifications, design and functional requirements of the Mazda vehicle, the Features and the Services.



The Mazda 6e and Mazda CX-6e vehicles have been designed in collaboration with third party service providers. Within New Zealand, Mazda NZ acts as a controller in regard to the App's related data processing activities. In order to be able to offer you all Features, Services and benefits such as maintenance, repair, quality control, monitoring and other services with regard to the functionality and safety of your Mazda 6e and Mazda CX-6e vehicle, it is necessary that MC, Mazda NZ and/or certain third party suppliers as data processors receive certain vehicle related information which may include certain personal data and/or information in order to provide the appropriate support services based on their technical expertise and knowledge.

Data protection inquiries regarding processing activities described in this Privacy Policy can always be addressed at any time to Mazda NZ by ordinary mail or email. Please find respective information under www.mazda.co.nz/digital-services-and-apps/mazda6e-legal and see Mazda NZ's contact details below.

II. Features

1. General information

In this section we describe how personal data is collected and processed when making use of the Features in your Mazda 6e and Mazda CX-6e vehicle.

Many of the functions offered and used in the Features do not require data to be collected from the vehicle and transmitted to Mazda NZ or third-party systems. Insofar as data for the use of a function or Feature is stored exclusively in the vehicle, these processes are not within the scope of the provisions of the Privacy Act and are not subject to this Privacy Policy.

In these cases, we provide you with information in the relevant manual and/or additional instructions on how and to what extent you can change or delete data stored in your vehicle. Once you sell your vehicle or transfer it (permanently) to third parties for use, it is possible that information stored in the vehicle can continue to be viewed if you have not deleted the information beforehand. Accordingly, it is your responsibility to delete your vehicle's information if you do not want this to be passed on to any future vehicle owner.

2. Purposes of Processing and Categories of Personal Data

In accordance with the Privacy Act, we collect and process your personal data in connection with the Features and the Services only insofar as the collection and processing is:

- necessary for the conclusion or performance of the Mazda 6e and Mazda CX-6e vehicle purchase contract;
- collected for a lawful purpose;
- where appropriate, based on consent; and
- necessary for the purposes of legitimate interests of us or third parties which require such information in order to be able to make the App, the Features and the Services available to you.



We process your personal data for the following purposes:

- Activating your vehicle to establish an internet connection and use with the Features
- Creating a user profile in the vehicle and linking it to the App
- Using remote Services to control individual vehicle functions
- Displaying vehicle information (including the vehicle status) in the App
- To enable use of a digital key for the vehicle via Bluetooth key
- To enable use of the voice assistant in your vehicle
- Connecting your mobile phone to the in-car entertainment system and establishing a connection to third-party providers
- Connecting your vehicle to third-party wireless networks (e.g., Wi-Fi)
- Using navigation Features and Services with live traffic information
- Using Intelligent Speed Assistance (ISA)
- Monitoring charging relevant data and charging your vehicle at charging stations
- Performing software updates
- Collecting error data and other technical vehicle data to improve our systems, the Features, the Services and other technologies
- Ensure cybersecurity of the vehicle, backend, and App via continuous security monitoring, incident detection/response, integrity checks (incl. OTA), fraud/misuse prevention, and regulatory compliance.

When doing so, the following categories of personal data are collected from your vehicle and processed:

- Vehicle identifiers and other hardware identifiers (e.g., vehicle identification number (VIN), vehicle ID, other unique hardware identifiers such as IMEI, MAC address, IMSI information of the SIM card)
- User account data, such as email address, account ID, username
- Virtual identification and authentication information, such as verification codes, tokens, customer or account IDs, digital certificates
- Vehicle and trip-related information and telemetric data, such as vehicle status, trip duration, mileage, diagnostic error code system and application protocols for error analysis and product improvement
- EV-drive-related information such as battery identification, battery and charging status and battery temperature
- Location data, such as the position, latitude and longitude of your vehicle
- Sound recording information (e.g., when using the voice assist).

For details on how we process personal data in the context of a particular Feature, please refer to Part III. For further details on other purposes for which we process your personal data, please refer to Part IV.

All personal data described in the Parts of this Privacy Policy is collected directly from your vehicle (e.g., its sensors and related applications as made accessible through the infotainment system) or made available by you through the Features (e.g., by entering certain personal information via the Features) and is processed in connection with the Features.



Currently, the following Features are offered:

- Account Creation, Login and Vehicle Binding
- Remote Control, Monitoring and Bluetooth Key
- OTA Updates
- Charging
- Voice Assistant
- Map and Navigation and ISA
- Security Management
- Wireless Communication and Network Connectivity (Bluetooth® Audio/Hands-Free Cal/Wi-Fi/Apple CarPlay/Android Auto™)

The data described in this Part is required to provide the Features. Once you acknowledge this Privacy Policy, the following Features will be activated in your vehicle:

- Microphone authorisation (for intelligent voice (VR), Bluetooth phone, camera - record sound, Car External Announcement (for Mazda CX-6e only)
- Vehicle positioning authorisation (for navigation, intelligent voice navigation (for Mazda 6e only)
- Camera authorisation (in car monitor - distraction reminder (for Mazda 6e only), in car monitor - gesture recognition camera (for Mazda 6e only), Camera).

You can deactivate and/or customise these Features at any time separately in the settings of the head unit. For example, you may use the navigation or voice assistance Feature in "full privacy mode" which does not entail the transfer of personal data to third party providers. This will, however, also have the effect that you will not be able to make use of all or some of the functionalities or Features. Further information on how you activate, deactivate or customise the Features and/or related functionality and/or Services is provided in the Mazda manuals which can be accessed in the menu of your head unit (e.g., *Navigation Owner's Manual*, *Owner's Manual*, *Connected Service Manual* ("**Manuals**").

As part of the use of the respective Features and related functions and/or Services, personal data is processed and, depending on the Feature and/or Service or the respective settings, transmitted from the vehicle to third parties. The processing of personal data is explained in more detail in Part III.

Neither Mazda (including Mazda NZ) nor the external third parties will engage in automated decision-making, including profiling in connection with the Features, unless you have been expressly notified by way of inclusions in this Privacy Policy or by other means in writing.

Your location data will not be collected on an ongoing basis unless it is necessary for the Features or Services you have subscribed to.

3. Specific Features

3.1 Account Creation, Login and Vehicle Binding

To use the Features, you need to register for Features through the App and bind your vehicle to our centralised vehicle backend with the support of the Mazda authorised dealer you purchased your vehicle from ("**Dealer**"). You may activate your account in the vehicle by logging in with the App QR scanner. Activating your account in the vehicle is a prerequisite to connect your vehicle to the vehicle backend making use of some Features and Services related to your vehicle, such as voice assistant, maps and navigation.



If you have not activated your account in your vehicle by scanning the QR code in the head unit of your vehicle with the App QR scanner, you can only continue as a “guest”. In this case, the “Full Privacy Mode” will automatically be activated, and certain Services will be restricted due to the disconnection from the vehicle backend.

When activating your account with the App QR scanner and binding your vehicle, you can select “Connected Service and Analysis Mode” (for Mazda 6e), “Connected Service Mode” (for Mazda CX-6e) or “full privacy mode”. In this context and subject to the below descriptions for each Feature, we may collect the following personal data to enable your registration and activation to the Features in your vehicle:

- name
- nickname
- avatar
- email address
- chosen language
- country
- account data
- network identifier
- account identifier
- vehicle setup records
- password
- verification code
- vehicle identification number (VIN)
- IMEI and other device IDs
- customer service account ID

and a related token, including user authentication token.

Furthermore, we log acknowledgement of this Privacy Policy and your agreement to our Terms of Use.

When you make use of the Services, further personal data is processed. We inform you about the processing of your personal data in connection with the use of the App in Part III.

You can switch to Full Privacy Mode at any time via the vehicle settings once you have logged in.

3.2 Remote Control, Monitoring and Bluetooth Key

We offer Remote Control and Monitoring in the form of remote Services through the App such as monitoring your vehicle status (e.g., regarding battery status as well as enabling the locking/unlocking of your vehicle), also with a Bluetooth key.

For offering these Services, which are operated through the App, we collect and process the following personal data from your vehicle:

- VIN
- Power and charging data
- Mileage data
- Control status of door locks, charging, doors, windows, seat, wheel, trunk (depending on the model), lights, brakes, airflow, temperature, humidity, air quality, tire pressure, speed, air conditioning, PM2.5, interior air quality, defrost, braking, gear position, drive motor data and voltage data.
- Alarm data
- IMS (In-vehicle Monitoring System) data
- In-car radar information



We synchronise the required data about your vehicle to be displayed in the App according to your actions when you manage and control your vehicle via the App.

3.3 OTA Updates

With OTA Updates, we are able to provide you with software updates for vehicle systems and functions as well as the map and infotainment system for you to receive wireless ("over-the-air", together "OTA Updates"). You will be notified via the head unit if new OTA Updates are available. OTA Updates are automatically downloaded to your vehicle to prepare the relevant installation. You will be asked to choose whether you want to complete the OTA Updates now or later. OTA Updates does not require you to log-in with your account in the vehicle.

The provision of OTA Updates requires the collection and processing of certain vehicle related data by us, such as:

- VIN
- Master ID
- Domain ID
- Part ID
- Part Version Number
- Part Hardware ID
- Part Hardware Version Number
- Upgrade Record
- Upgrade Log
- Upgrade Equipment
- Vehicle Model
- Upgrade preferences you entered for the in-vehicle terminal.

3.4 Wireless Communication and Network Connectivity

You can connect your vehicle to external devices through Bluetooth® Audio / Hands-Free Call / Wi-Fi or through Apple CarPlay / Android Auto Services. To do this, you establish a connection between your vehicle and your phone (e.g., via a Bluetooth connection). When doing so, you can use your phone's data multimedia Services via the head unit.

Please note that for this purpose, data from your vehicle, including your vehicle ID and other technical information, will be transmitted from your vehicle to the respective services provider (e.g., Apple or Google).

These Services are not offered or provided by us. These Services are third party services offered by third party service providers and such third party service providers should contact you directly. See Apple: <https://www.apple.com/legal/sla/>; and Google: <https://policies.google.com/terms/service-specific>; regarding certain additional terms and conditions which may apply. We have no influence over their availability and the content offered by Apple or Google. Please make yourself familiar with the processing operations with regards to personal data of Apple and Google by reviewing their privacy policies at: Apple: <https://www.apple.com/legal/sla/>; and Google: <https://policies.google.com/privacy#infocollect>.

Please note that this Feature and the related Services are available only after you have confirmed the Feature's activation during the initial set up process. Otherwise, such Feature, and related services, will not be available.



Please note that the data which is relevant for making use of a Feature or related services is usually stored locally in your vehicle and can be deleted manually or processed by the relevant third-party service providers (e.g., Apple and Google) in accordance with their terms of use and privacy policies.

Mazda will not have access to data collected by third party services providers such as Apple and/or Google.

3.5 Charging

To provide you with convenient charging, monitoring and Services, and at the same time charging data feedback on your App, we collect and process the following personal data (note: this list is not exhaustive):

- VIN
- Vehicle power
- Battery charging status
- AC charging cable connection status
- DC charging cable connection status
- Charging current
- Remaining charging time
- Cruising range information
- Reservation charging status
- Reservation start time
- Reservation end time

For related Features in the App please see Part III.

3.6 Voice Assistant

When you use the voice assistant (“**Voice Assistant**”) related functions, you need to turn on the in-vehicle microphone first and wake up the Voice Assistant through the in-vehicle voice button, wake-up words, or wake-up conditions you set before you can carry out voice interaction. During the voice interaction, the voice data (in-vehicle audio information) will be processed according to the functions you set or select.

This Feature and the related services are available only after you confirm the Feature’s activation during the initial set up process. Otherwise, such Feature, and the related services, will not be available. You can deactivate the Feature at any time in the settings in your head unit.

If you confirm Voice Assistant during the initial set up and do not otherwise customise the service settings, the voice data will be transmitted as follows to complete the Voice Assistant service:

- If you drive a Mazda 6e to the technical Voice Assistant support services provider (i.e., Megatronix (Beijing) Technology Co., Ltd.; Room 1101, Floor 11, Building 6, No. 34 Chuangyuan Road, Chaoyang District, Beijing, China)
- If you drive a Mazda CX-6e to Microsoft Azure AI Foundry Service which locate in West Europe Region and it will be managed by the technical Voice Assistant support service provider Thunder Software Technology Co.,Ltd.(hereinafter referred to as “Thunder”); No. 3 Building, No. 9 Courtyard, Qinghua East Road, Haidian District, Beijing, China.



The duration and range of the audio information we collect may be related to your settings. You can customise the Voice Assistant service in the settings of the head unit of your vehicle and use, for example, by utilising an “offline” version which does not entail the transfer of voice recording information to the Voice Assistant Services Provider outside your vehicle. Please note that in this case, the services will be limited and not all functions and Features of it can be used.

To enhance the optimisation and improvement of voice wake-up, recognition, semantic understanding and related functions, the in-vehicle audio information will be stored for 90 calendar days by the Voice Assistant Services Provider for the learning and training of the corresponding voice algorithms to enhance the Voice Assistant capabilities. After 90 calendar days, the in-vehicle audio information will be deleted from the system of the Voice Assistant Services Provider, and the in-vehicle voice data will be anonymised and processed, to avoid any association with you or with your vehicle.

In addition, when you manipulate or use other functions or applications through Voice Assistant, we may synchronise the relevant information under these functions or application scenarios to complete the command docking processing. For example, making a Bluetooth phone call via Voice Assistant will collect the telephone number, and then make a call according to your voice command; initiating navigation via Voice Assistant will synchronise the collection of your vehicle location, destination, or route; playing music/video via Voice Assistant will collect your search information and playback history.

To operate the Voice Assistant, the following personal data is processed:

- Vehicle ID
- In-vehicle audio information communicated to Voice Assistant, including vehicle location data, telephone number, voice content commands for recognising voice content and executing your voice commands
- Vehicle log data.

Such data is transmitted and used for the aforesaid purposes by the Voice Assistant Services Providers. Such data will not be transmitted to us. The telephone number is stored locally and used to execute your voice commands to make calls.

The Voice Assistant is a third-party service of the Voice Assistant Services Provider for which certain additional terms and conditions may apply. We have no influence over the availability and the content offered by the Voice Assistant Services Provider. Please make yourself familiar with the processing operations with regards to personal data of the Voice Assistant Services Provider in its privacy policy at:

If you drive a Mazda CX-6e, <https://en.thundersoft.com/privacy-mzd-eu>

The voice content we collect is biometric information for the purposes of the Biometric Processing Code 2025. This Code requires us to adopt safeguards to reduce privacy risk, and limits particularly intrusive uses of biometric technologies like using them to predict people’s emotions or infer information like ethnicity or sex, or other information protected under the Human Rights Act 1993.

3.7 Maps and Navigation and ISA

Map and navigation services are provided by the following third-party services providers:

- If you drive a Mazda 6e, Telenav Shanghai Inc, 27F & 28B V-Capital, with its registered office address at No.333, Xian Xia Road, Shanghai, China (“Telenav”) will be your third-party service provider.



- If you drive a Mazda CX-6e, MXNAVI, with its registered office address at No. 861-6, Shangshengou Village, Hunnan District, Shenyang City, Liaoning Province, P.R. China ("MXNAVI") will be your third-party service provider.

To provide these services, personal data, including but not limited to VIN, vehicle position, pseudonymized TUID, search data, and route data, is transmitted to and processed by Telenav/MXNAVI.

The feature is only available if you have confirmed the use of the Telenav/MXNAVI services and activated vehicle location and connectivity for in-vehicle applications in the initial set up in your vehicle which can be deactivated at any time. The feature (vehicle positioning authorisation) as well as the use of the Telenav/MXNAVI services can be customised or deactivated at any time in the settings in the vehicle head unit. For example, you may use the navigation feature without the additional Telenav/MXNAVI content and services which can be customised in the settings in the head unit. In this case, however, the full range of the features may not be available.

Please make yourself familiar with the processing operations with regards to personal data of Telenav/MXNAVI in the privacy policy at:

Telenav <https://www.telenav.com/legal/tg2-pp>

MXNAVI <https://www.mxnavi.com/#/legal/policies-navigation-mazda-er>

Certain additional terms and conditions may apply to the services provided by Telenav/MXNAVI. We have no influence over their availability or the content offered by Telenav/MXNAVI.

If you confirm your use of the aforementioned services during the initial vehicle setup process, your personal data will be transferred to the respective service providers as described above. You can customise your service settings at any time and limit your use of the services to those that do not involve the transfer of your personal data to external third-party service providers.

ISA is a Feature to obtain the speed limit data within the ISA electronic map based on your vehicle's location information for intelligent driving use. That location data and the encrypted VIN ID may be used by the Map Services Provider to provide you with the service. To provide you with ISA system, Telenav/MXNAVI may use a third-party affiliate map provider to extract and deliver speed limit data and alerts for the areas you are navigating, and we (directly or through third party services providers) may combine the data extracted and provided by Telenav /MXNAVI with visual recognition data to deliver you relevant speed data. Third party services are always governed by their own privacy policies in the context of such functionality, which you will be able to find on such service providers' websites. We have no influence over their availability and the content.

The ISA service is provided by Mazda (directly or through Third-Party Providers). The third-party services always are governed by their own privacy policy in the context of such functionality, which you can find on their website.

In order to provide the service, the following personal data is transmitted to and processed by Map Services Provider:

- For navigation: vehicle location/position data, encrypted VIN ID, user behaviour tracking data, home /work / other labelled location address.
- For ISA: vehicle location/position data, encrypted VIN ID.



3.8 Monitoring, Reminder and Gesture Recognition

To make use of the Features

- In car monitor - distraction reminder (for Mazda 6e only)
- In car monitor - gesture recognition camera (for Mazda 6e only)
- Camera

the camera permission in the vehicle head unit needs to be activated. When using the Features, certain personal data / data such as video images, sound recordings and photos are recorded and stored in the vehicle to enable the relevant Features. The data is not transmitted to places outside the vehicle and are regularly overwritten in the vehicle storage.

If you have not confirmed the activation of the Feature during the initial set up process in the vehicle head unit, the Camera authorisation and the related features (In car monitor - distraction reminder (for Mazda 6e only), In car monitor - gesture recognition camera or Mazda 6e only)), will not be activated, will not work and you will not be able to use it.

The (i) In car monitor – fatigue reminder (for both Mazda 6e and Mazda CX-6e); and (ii) In car monitor – distraction reminder (for Mazda CX-6e),(iii) In car monitor - gesture recognition camera(for Mazda CX-6e),remain enabled by default and cannot be disabled.

3.9 Security Management

To ensure the safe and stable operation of the Features provided, and to safeguard account security, we collect and process the following personal data:

- Attack destination IP address
- Attack target port
- Event occurrence time
- Network protocol
- Attack rule ID
- Attack source IP address
- Attack source port
- Log type
- Device to be detected and log type
- Data length
- CAN bus code
- Rule code
- Signal start bit
- Signal length
- Message length
- Abnormal CANID
- Detection time
- Detection cause high bit
- Detection reason low bit
- Reserved number
- Reserved position
- TBOX TUID
- Full CAN/CANFD message.



This enables the use of certain Features and supports our legitimate interests in securing your vehicle and our systems against unlawful access or impeding through IT security related risks.

4. Data of other persons, vehicle usage by a third party

In case other persons use your vehicle (e.g., a co-driver or someone you have lent your vehicle to), their personal data might be collected and processed during the use of the Features. Unless the person has not logged into the vehicle with a separate account, we have no information on the person or any related personal data to identify such a person. You must ensure that the data subjects are properly informed on the data processing activities as described in this Privacy Policy.

If you sell or permanently lease/lend your vehicle to a third party, make sure that this third party will not be able to access any of your personal data through the vehicle's head unit (e.g., by deleting relevant information in the navigation system). It is your responsibility to ensure that information which you do not want other users of your vehicle to see is deleted in advance of you granting access to your vehicle.

You can remove a vehicle from the App under "Me" by selecting "My Vehicle" in the "Vehicle Details" and by clicking on "Unlink Vehicle". By removing a vehicle from your list, your driving data will no longer be visible in the App and your vehicle will be disconnected from the App. If you do not remove your vehicle, the data might still be accessible through the App. Please be informed that your account data in the App will not be deleted until you delete your account (see Part III).

5. Recipients and Categories of Recipients

Due to their roles when offering the Features and/or Services, Mazda NZ and MC will receive and process certain personal data. Any access to your personal data at Mazda is restricted to those individuals that have a need to know to fulfil their responsibilities.

In the context of enabling the Features and/or related Services, Mazda will process the relevant personal data in their respective roles as follows:

- Mazda NZ will receive and process the relevant personal data for the operation and maintenance of the relevant systems and Services for Features and software updates, the handling of related issues and troubleshooting, as well as handling of related user enquiries.
- Mazda will receive and process the relevant personal data for the operation and maintenance of the relevant systems and Services, the handling of related issues and troubleshooting, as well as the overall management of the systems and services (including the supervision of third party services providers and subcontractors).

Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data on behalf of, or in collaboration with, Mazda as necessary for the respective processing purposes. Data processors will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal data, and to process the personal data only as instructed.

Mazda will receive, and process certain personal data collected through the Features for the operation and maintenance of the relevant systems and Services and software updates as well as the handling of related issues and trouble shooting. In this capacity, Mazda will act as a controller.

Certain technical third-party suppliers will support Mazda with the operation and maintenance of the relevant systems and Services for connected vehicle Features and software updates as well as the handling of related issues and troubleshooting as a processor to Mazda with other third-party suppliers as sub processor for the handling of related issues and trouble shooting. The third-party providers will be bound by respective instructions.



Mazda will involve further sub processors as necessary to provide technical support (e.g., with the operation and maintenance of the relevant systems and Services and trouble shooting).

Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data to meet the purpose of their contractual obligations. Therefore, we are passing on personal data, if necessary, to the fulfilment partner for the roadside assistance and to authorized Mazda dealerships and workshops, as well as independent workshops. We may also pass on certain personal data to governmental authorities, courts, external advisors, and similar third parties that are public bodies as required or permitted by applicable law.

6. Storage Period

Unless otherwise stated in this Privacy Policy, your personal data is stored by Mazda strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the personal data is collected in accordance the Privacy Act and other applicable data protection laws.

When Mazda no longer needs to process your personal data, we will erase it from our systems and/or records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which Mazda is subject (e.g., personal data contained in contracts, communications, and business letters may be subject to statutory retention requirements, which may require retention of up to 6 to 10 years).

There are specific storage periods for the following items:

- User data, such as name, address, email address, will be kept until the user deletes its app account. This means that cached content is automatically deleted after the validity period expires, and stored data is deleted or automatically deleted after user account closure. If you change your email address via the App, the old email address will not be stored.
- Data relating to OTA Updates will be retained for a period of 10 years after the respective model has ceased to be produced for product monitoring, safety and defence against product liability or related claims.
- Unless necessary for another specific purpose (see, amongst others, Part IV), Feature and related service information and/or telemetry data is stored for three (3) months. Critical telemetry data or alters may be stored for a longer period, which usually lasts up to one (1) year but may last longer depending on the purpose.

We may anonymise your personal data (e.g., for the purpose of business analytics, research and development or statistical purposes) and then may use such anonymised information indefinitely.

III. App

In this Part, we describe how personal data is collected and processed when making use of the remote-control Services in the App. For related processing activities in Features, see Part II.

1. Purposes of Processing and Categories of Personal Data

The App will provide you with the following key functions:

- User Account
- Vehicle Linking / Authority Sharing
- Remote Control
- Digital Key
- Owner Manual



In accordance with IPP 1 of the Privacy Act, we collect and process your personal data in connection with the Services only insofar as the collection and processing is:

- necessary for the conclusion or performance of the App contract
- collected for a lawful purpose
- where appropriate, based on consent
- where it is necessary for the purposes of legitimate interests of us or third party services providers.

For details on individual services, please refer to the respective Service description in the App Terms of Use.

All (personal) data described in the Parts of this Privacy Policy was made available by you through the App (e.g., by entering certain personal data via the App) and is processed in connection with the Services.

The data described in the Parts of this Privacy Policy is required to provide the Services. Without this information, the Services cannot be performed.

To provide the Services once connected through the App, a connection will be established between your vehicle and our backend which requires the processing of certain vehicle related data such as the vehicle SIM card ID, IP address, the VIN and further App user related data.

Mazda does not engage in automated decision-making, including profiling in connection with the Services, unless you have been expressly notified otherwise in this Privacy Policy or by other written means.

2. Individual Features

2.1 User Account

Through the App, the following registration and user account Services will be provided:

- Opening/deleting user accounts
- User account login/logout
- View and change user account information (password change)
- Vehicle binding (Vehicle SIM card will be activated after vehicle binding)
- Scan QR code to register of the vehicle user account.
- Login mobile Devices control

We only process your personal data when you start the registration process in the App and while managing your app account, including opening and closing your account, log-in and log-out, as well as checking and changing user account information and linking email address and activation of the vehicle SIM card.

The purpose of our processing of your personal data is to ensure your access to the App functions and Services and to provide you with all Features. When you log in to the App, the SIM card in the vehicle is activated at the same time so that you can use your vehicle's Features. To register your vehicle user account, you can use the App to scan a QR code in the vehicle head unit.

The data collected in connection with the registration and managing your app account includes your:

- Email address
- Language
- Country code
- Password/Mail Authentication Code



- CAC Account ID
- CAC Account Token
- TSP-side Token
- Account Authentication Token
- Cell phone number, device type, device name & device ID
- Login password.

Furthermore, we log your acknowledgement of this Privacy Policy and acceptance of our Terms Use.

Cached content is automatically deleted after the expiration date (90 days), and personal email addresses are deleted after account deactivation or when logged out/expired. After account deletion or email address linkage modification, original data is deleted.

2.2 General App Usage

When you use the App, your device automatically transmits log files which we will store. These log files particularly include information about your device and IP address. Our legitimate interest is to ensure the security and functionality of the App, to defend us against possible cyber-attacks and prevent infringements of rights by third parties.

The automatically collected personal data will be stored for a maximum of 90 days and then be deleted, unless longer storage is required by law or otherwise permitted (e.g., based on your consent).

2.3 Vehicle Linking/Authority Sharing

Through the App, the vehicle linking/authority sharing Services will be provided.

The purpose of our processing your personal data is to send an authorisation code to the owner's email address based on the OEM's request and tie the vehicle Features to the owner and for sharing of vehicles to non-owners.

The data collected in connection with the vehicle linking/authority sharing includes your:

- Vehicle account ID
- (Shared) email address
- Email authentication code
- Account authentication token
- Vehicle type
- VIN
- Authority sharing validity period

The personal data will be deleted after the vehicle has been unlinked/unaccounted for and after the vehicles have been unlinked/voluntarily de-sharable by the vehicle owner/after the sharing period has expired.

2.4 Remote Control

Through the App, the following remote-control Services will be provided and will be activated as a pre-setting if not deactivated separately or entirely:

- Checking vehicle status
- Remote control of the vehicle
- Share vehicle control authority to other people
- Remote control of security codes
- Battery reservation heater / charge reservation.



The provision of the Services requires the collection and processing of certain vehicle related data such as:

- Temperature
- Tire Pressure
- Speed + Position
- Cumulative Mileage
- Electric Mileage
- Vehicle Condition
- Seat Condition
- Air Conditioner Temperature
- Windshield Condition
- Sunroof Condition
- Remote switching of door locks
- Remote switching of air conditioner
- Remote switching of windows
- Remote toggle of lights
- Remote toggle of horn
- Remote toggle of trunk (only available for Mazda 6e)
- Remote control of seats
- Remote charging, and control results of these commands,
- Remote security code
- Vehicle ID
- Account Authentication Token
- Travel Plan Type
- Start Time
- End Time
- Customer Time Zone
- Vehicle Registration Number
- In-car radar information.

The data is processed so that the owner can remotely check and control the vehicle information, the status of the doors, boot, windows, air conditioning, seats, etc., and the charging via the app, set and change the security code, and use the battery heating reservations, battery charging service.

The latest data reported in the vehicle cycle is stored and then deleted when the vehicle is scrapped/deleted or after the vehicle has been decoupled. Remote control vehicle data is deleted either when the account is closed or if the user has already deleted the data. The remote-control security code data is deleted when the vehicle is unhitched or when the user account is deleted. Battery reservation heater/charge reservation data is deleted when the vehicle is unlinked/the service is completed.

2.5 Digital Key

Through the App the following digital key Services will be provided:

- Activate, download and deactivate digital keys
- Share digital keys
- Manage your digital key



The digital key function allows users to activate, download and deactivate digital keys, to share digital keys and to manage your digital key data. You can use your digital key to unlock/lock the vehicle, open/close the window, open/close the trunk, flash the lights/whistle, open/close the electric tail (for Mazda 6e only), start the vehicle and for other relevant car controls.

For this purpose, the personal data such as:

- account ID
- VIN
- digital key
- Bluetooth MAC Address
- device Model/Model
- device serial number
- device manufacturer
- vehicle ID
- key type
- sharer email address
- sharing start time sharing end time
- sharing authority

are processed in order to properly authenticate and allocate the digital key to the smart devices and to ensure the security of the service and systems involved. Such information will be shared between the vehicle and the relevant devices by near-field communication (NFC) or ultra-wideband (UWB).

The processed Digital Key Service data will be deleted either upon cancellation of the user account or if the data has already been voluntarily deleted by the user.

2.6 Owner Manual

Through the App, the Manuals are made available for certain Features of your vehicle.

The vehicle owner / App account holder can access the Manuals for the vehicle and view the Manuals linked to the App. For this purpose, data such as VIN and the car type are processed.

3. Recipients and Categories of Recipients

Due to their role when offering the App and/or related Services, Mazda NZ and MC will receive and process certain personal data from the App and the connected vehicle for the aforesaid purposes. Any access to your personal data at Mazda is restricted to those individuals that have a need to know in order to fulfil their job responsibilities.

In the context of offering and operating the App and/or related Services, Mazda will process the relevant personal data in their respective role as follows:

- Mazda NZ will receive and process the relevant personal data for the operation and maintenance of the App and the relevant systems and Services, the handling of related issues and troubleshooting as well as handling of related user enquiries.
- MC will receive and process the relevant personal data for the operation and maintenance of App and the relevant systems and Services, the handling of related issues and troubleshooting



as well as the overall management of the systems and Services (including the supervision of third party services providers and subcontractors).

Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data on behalf or in collaboration with Mazda under appropriate instructions as necessary for the respective processing purposes. Data processors will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal data, and to process the personal data only as instructed.

In this context, Mazda will receive, and process certain personal data collected through the App for the operation and maintenance of the relevant systems and Services for the App, as well as the handling of related issues and trouble shooting. In this capacity, MC will act as a controller. A technical third-party services provider will support Mazda or MC with the operation and maintenance of the relevant systems and services for the App, as well as the handling of related issues and troubleshooting as a processor to Mazda with other technical third party providers as sub-processor for the handling of related issues and trouble shooting. The third party providers will be bound by respective instructions.

Mazda will involve further sub-processors as necessary to provide technical support (e.g., with the operation and maintenance of the relevant systems and services and trouble shooting).

Further processors are involved for the following:

- data processor for the provision of attending to calls to Mazda regarding user requests
- data processors used to implement for data corrections
- data processor for monitoring vehicle data to detect cyber security issues
- data processors for notifying users (push notifications, SMS and email)
- data processors to manage vehicle status information to speed up the data acquisition and notify users quicker.

Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data to meet the purpose of their contractual obligations. Therefore, we are passing on personal data, if necessary, to the fulfilment partner for the roadside assistance and to authorised Mazda dealerships and workshops, as well as independent workshops. We may also pass on certain personal data to governmental authorities, courts, external advisors, and similar third parties that are public bodies as required or permitted by applicable law.

4. Storage Period

Unless otherwise described in this Privacy Policy, your personal data is stored by Mazda strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the personal data is collected in accordance with the Privacy Act and other applicable data protection laws.

When Mazda no longer needs to process your personal data, we will erase it from our systems and/or records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which Mazda is subject (e.g., personal data contained in contracts, communications, and business letters may be subject to statutory retention requirements, which may require retention of up to 6 to 10 years).

There are specific storage periods for the following items: user data, such as name, address, email address will be kept until the user deleted its app account. This means that cached content is automatically deleted after the validity period expires, and stored data is deleted or automatically deleted after user account closure. If you change your email address via the App, the old email address will not be stored.



5. Termination of account

If you choose to terminate your App user account in the App's menu, all personal data related to your user account in the App will be deleted, unless other reasons for storage or retention periods apply (see Part III, Sections 2.1 and 2.2).

Please note: It also deactivates the vehicle SIM card that was activated when the App account was registered. Any vehicle functions and remote app functions in use will then no longer be available.

6. Personal Centre

The implementation of new technologies or the introduction of new Services might require future changes to this Privacy Policy which we may make at any time. We will inform you about such changes in the App. In the event of a change, you can view the historic versions of the Privacy Policy to which you have agreed and the version update. To obtain the historical version of the Privacy Policy, you can contact our customer service by selecting "Contact Us" in the App's Menu under "Me" – "About Us".

If you have any questions about or in connection with this Privacy Policy, you may contact Mazda NZ:

- by email to privacy@mazda.co.nz; or
- by phone call to Mazda on 0800 800 626.

IV. Quality & Service & Security

We process the personal data collected from the vehicle in the context of the use of the CV Services and/or the App for the following additional purposes:

1. Mazda Contact

When you contact us by telephone or e-mail regarding the Features, the App or Services or the vehicle itself, we need to check your identity. In case you contact us via an email address known to us, no further details will be requested. If you contact us by phone, three (3) security characteristics must be correctly answered. Together with a description of your problem, your request can be processed by our team. In addition, where necessary to process your request, further data as collected from Mazda internal systems (e.g. Digital Service Record, Warranty System) may be processed such as location data, malfunction information, maintenance and warranty information, service campaigns, etc. or other data as available through our internal data bases (e.g., registration number, email address, etc.). The collection of this data will enable us to assist in solving your technical problems if you should contact Mazda.

If your problem cannot be solved directly by us, we may other Mazda entities for further clarification. Therefore, data such as fact summary, error message code, User ID and for vehicle related issues, further data such as VIN and product quality information report may be transferred to the aforesaid support teams of said entities and may be processed there to respond to your inquiry and support your request.

2. Product Monitoring and Product Improvement

Mazda will analyse data collected when making use of the Features, the App and/or Services or the vehicle itself regarding performance, usage, operation and condition of the vehicle or its Features and Services for the purposes of ensuring the security (including IT security) of your vehicle. For this purpose, certain Features and other vehicle and telematics related data will be collected for the car and/or transferred to a secure data storage with MC. This will include vehicle data connected to a VIN.

The data will be shared with MC and certain technical third-party providers to enable MC to



perform the analysis of safety concerns, quality issues and issuance of product recalls or to defend ourselves against claims concerning malfunctions of our products and services. The data will be stored in a secure data storage with restricted access. Unless required to achieve the intended purpose, data will be processed in pseudonymised form (without reference to a natural person). Geolocation data will be stored separately and processed where strictly necessary to analyse and remedy a malfunction.

We process this information collected in order to ensure the safety, operability, and security (including IT security) of our products and services and our interest to defend us and our group companies against claims concerning malfunctions of our products and service, and we also utilise it to improve the Services and our products and in developing new products and services.

V. Further Remarks

1. Cross-Border Data Transfer

Some of the recipients of your personal data will be located, or may have relevant operations, outside of New Zealand. Depending on the country, the data protection laws may provide a different level of protection compared to the laws in New Zealand. In such a case, the transfer will be additionally secured so as to ensure that the information will be transferred to a country which is subject to laws with comparable safeguards to those in the Privacy Act.

2. Legal requirements to disclose data

If permitted by IPP 11 of the Privacy Act (e.g., to assist in the investigation of a crime), Mazda may release data stored by the Mazda entities to the extent necessary in individual cases.

Within the framework of the applicable law, government agencies are also authorised to read data from vehicles themselves in individual cases. For example, in the event of an accident, information can be read from the airbag control unit to help clarify the circumstances of the accident.

3. No obligation to provide data

There is no obligation upon you to provide any of your personal data. The provision of some of the personal data indicated in this Privacy Policy is required for the conclusion of a contract and in order to allow us to perform the requested Services. You may choose not to provide us with certain of your personal information – in which case, you will only be able to obtain limited usability of the Features and Services.

4. Your Rights

If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Pursuant to the Privacy Act, you are entitled to request access to your personal data and to request correction of your personal data.

In addition, you may approach the Office of the Privacy Commissioner with concerns about privacy infringements.

4.1 Right of access (IPP 6 of the Privacy Act):

Upon request, you are entitled to receive confirmation from us as to whether we hold personal information about you, and access to that personal information.

4.2 Right to correction (IPP 7 of the Privacy Act):

You are entitled to request us to correct any inaccurate personal data concerning you. To this end, we are required to take reasonable steps in the circumstances to ensure that your



personal information is accurate, up to date, and not misleading.

5. Third party collection

When a third party collects personal information from you, in accordance with IPP 3A of the Privacy Act, they are required to take reasonable steps to ensure you are aware of this collection and associated details, unless an exception applies (e.g., it would prejudice law enforcement, or is not reasonably practicable). Therefore, as soon as reasonably practicable after collecting your information, third parties should notify you and provide the following information:

- The fact the third party has collected your information
- The specific purpose for the collection
- The specific source of the information
- The intended recipients of the information
- The name and physical address of the third party
- The law authorising or requiring the collection of the information
- Your rights to access and request correction of your personal information.

6. Processing data for other purposes

We process your personal data in order to provide you with the App, the Features and the Services as described in this Privacy Policy. We will also process your personal information for other purposes if we are obligated to do so on the basis of legal requirements (e.g., transfer to courts or criminal prosecution authorities), if you have consented to the processing or if processing is otherwise permissible under applicable law. If we process your personal data for another purpose, we may provide you with additional information.



By clicking the *“Agree and Continue”* button below, you confirm the activation of the features:

- Microphone authorisation (for intelligent voice (VR), Bluetooth phone, camera - record sound, Car External Announcement (for Mazda CX-6e only)
- Vehicle positioning authorisation (for navigation and intelligent voice navigation (for Mazda 6e only)
- Camera authorisation (in car monitor - distraction reminder (for Mazda 6e only), in car monitor - gesture recognition camera (for Mazda 6e only) Camera),

and agree to activate the Services of Telenav/MXNAVI (navigation) and Megatronic/Thunder with Azure AI Foundry Service (voice assistance) as further described in this Privacy Policy which entails the transfer of personal data to the services providers in order for them to provide their respective Services to you.

Otherwise, some or all of the above Features and Services or certain functions and services associated with them cannot be used except (i) In car monitor - fatigue reminder (for both Mazda 6e and Mazda CX-6e); and (ii) In car monitor – distraction reminder (for Mazda CX-6e), (iii) In car monitor - gesture recognition camera (for Mazda CX-6e) which remain enabled by default, or, for the Mazda CX-6e, can only be used locally. You can de-activate, re-activate and/or modify the scope of certain Features and Services in the settings in the head unit at any time, insofar as this is provided for the individual Features and Services except (i) In car monitor- fatigue reminder (for both Mazda 6e and Mazda CX-6e); and (ii) In car monitor – distraction reminder (for Mazda CX-6e), (iii) In car monitor - gesture recognition camera (for Mazda CX-6e) which remain enabled by default.

Further details can be found in the explanations in the respective section of the head unit and the Manuals.

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