

Privacy Policy – Mocean Subscription Platform

1. What is this Privacy Policy about?

In this Privacy Policy we inform you about the collection and processing of your personal data in connection with the use of our Mocean Subscription Platform.

We take your privacy serious and will process your personal data only in accordance with applicable data protection and privacy law.

2. Who is responsible for processing my data?

Hyundai Motor Europe GmbH Kaiserleipromenade 5 63067 Offenbach am Main, Germany (“**Hyundai**”), acting as data controller, is responsible for the processing of your personal data in connection with the provision of the Services as explained in this Privacy Policy.

Hyundai will be referred to as “**we**”, “**our**” or “**us**” in this Privacy Policy.

3. How can I contact the data controller and the data protection officer?

If you have any questions about or in connection with this Privacy Policy or the exercise of any of your rights, you may contact us by post via the contact details as stated in section 2. You may also contact Hyundai by email to dataprotection@hyundai-europe.com.

Alternatively, you may also contact our data protection officer via

Hyundai Motor Europe GmbH
c/o Data Protection Officer
Kaiserleipromenade 5
63067 Offenbach am Main, Germany

4. What categories of personal data are collected and processed, for what purposes and on what legal basis?

4.1 Informational use of the Mocean Subscription Platform

When you visit our Mocean Subscription Platform only for informational reasons, e.g. without registering for any of our provided Services and without providing us with personal data in any other form, we automatically collect so-called server log files (your IP address, the type and identification of your device, the type of your browser, the domain through which you access the Mocean Subscription Platform as well as your browsing data and activity on the Mocean Subscription Platform). We collect and process your personal data in order to provide you with our Mocean Subscription Platform and to ensure system stability and efficiency and to implement proper safeguards as to the security of our Mocean Subscription Platform and Services.

The personal data automatically collected is necessary to provide the Mocean Subscription Platform (Art. 6 (1) b) GDPR) as far as this is necessary to operate the Mocean Subscription Platform. In addition the processing of your personal data is based on our legitimate interest (Art. 6 (1) f) GDPR) with regards to our use of technical information to enhance our systems, make your usage of the Mocean Subscription Platform more convenient and ensure the security of the Mocean Subscription Platform. This is based on our legitimate interest as the personal data used for these purposes are stored for a limited period and do not allow us to personally identify a user.

4.2 Newsletter

On our Mocean Subscription Platform we offer you the possibility to subscribe to a newsletter to keep you informed with updates when we launch Mocean Subscription services in further countries.

We process your personal data for these purposes only, if you have previously specifically consented to the respective processing (Art. 6 (1) a) GDPR).

You can withdraw your consent for direct marketing purposes at any time without giving a reason, e.g. by using a link at the end of each newsletter. We delete your contact data in this relation after you withdraw your consent.

5. With whom is my data shared?

Any access to your personal data at Hyundai is restricted to those individuals that have a need to know in order to fulfill their job responsibilities.

Your personal data may be transferred for the respective purposes to the recipients and categories of recipients listed below and processed by those recipients for the respective purposes:

- Third parties – We receive and transmit your personal data from or to certain third parties, whether affiliated or unaffiliated, that are authorized to process your personal data under their own responsibility as far as necessary. For instance, we transmit your personal data to the Hyundai entity in your country, if you consented to get informed when we launch services to your country.
- Data processors – We grant access to your personal data to certain third parties, whether affiliated or unaffiliated, that process your data on behalf of Hyundai under appropriate instructions as necessary for the respective processing purposes. The data processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process your personal data only as instructed.
 - The data processor for operating and maintenance of the Mocean Subscription Platform is Casi AS, Lars Hilles Gate 30, 5008 Bergen, Norway.

These data processors may also use sub-processors for the provision of the respective services.

- Governmental authorities, courts, external advisors, and similar third parties that are public bodies as required or permitted by applicable law. E.g. in the event of traffic offences or a criminal offence, we may transmit your personal data to the relevant authorities or to the aggrieved party.

6. Is my data transferred abroad?

Some of the recipients of your personal may be located or may have relevant operations outside of your country and the EU/EEA, where the data protection laws may provide a different level of protection compared to the laws in your jurisdiction and with regard to which an adequacy decision by the European Commission does not exist.

With regard to data transfers to such recipients outside of the EU/EEA we provide appropriate safeguards, in particular, by way of entering into Standard Contractual Clauses with the recipients or taking other measures to provide an adequate level of data protection. A copy of the respective measure we have taken is available via Hyundai's data protection officer (see Section 3 above).

7. How long will my data be stored?

Your personal data is stored by Hyundai and/or our service providers, 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 applicable data protection laws. When Hyundai no longer needs to process your personal data, we will erase it from our systems and/or records and/or take steps to properly anonymize it so that you can no longer be identified from the data (unless we need to keep your information to comply with legal or regulatory obligations to which Hyundai 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 10 years).

There are specific storage periods for the following items:

- Informational use of the Mocean Subscription Platform: If you visit our Mocean Subscription Platform only for informational reasons, server log files will be deleted after 30 days.

8. What rights do I have and how can I exercise them?

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

Pursuant to applicable data protection law, you have the following rights with respect to the processing of your personal data. Please note that these rights might be limited under the applicable national data protection law.

8.1 **Right of access:** You have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to your personal data. This information includes – inter alia – the purposes of the processing, the categories of your personal data, and the recipients or categories of recipients to whom your personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the personal data about you undergoing processing. For any further copies you might request, we may charge a reasonable fee based on administrative costs.

8.2 **Right to rectification:** You have the right to the rectification of any inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data updated, including by means of providing a supplementary statement.

8.3 **Right to erasure ("right to be forgotten"):** Under certain circumstances, you have the right to the erasure of your personal data and we may be obliged to erase your personal data.

8.4 **Right to restriction of processing:** Under certain circumstances, you have the right to have a restriction placed on the processing of your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

8.5 **Right to data portability:** Under certain circumstances, you may have the right to obtain from us a copy of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You have the right,

without hindrance from us, to transfer this data or have it transferred directly by us to another entity.

8.6 Right to object: Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to processing your personal data, and we can be required to no longer process your personal data. If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

8.7 Right to complain: You also have the right to make a complaint with the competent data protection supervisory authority, in your country of origin.

9. Am I obliged to provide my data?

You are not obliged by any statutory or contractual obligation to provide us with your personal data. As well, you do not need to provide your personal data for the conclusion of a contract. But if you do not provide your personal data, it is possible that the usability of our Services is limited for you.

10. How can this Privacy Policy be changed?

We may change and/or supplement this Privacy Policy from time to time in the future. Such changes and/or supplements may be necessary in particular due to the implementation of new technologies or the introduction of new services. We will publish the changes on our Mocean Subscription Platform.