

## ANNEX 2:

# FORD OTOMOTİV SANAYİ ANONİM ŞİRKETİ

## PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA WITHIN THE SCOPE OF THE CONNECTRUCK SYSTEM

(“Privacy Policy”)

Ford Otomotiv Sanayi Anonim Şirketi (“**Ford Otosan**” or “**Company**”) attributes great importance to the secure and transparent processing of your personal data in conformity with the law and good faith. This Privacy Policy (“**Policy**”) is prepared for the objective of explaining how and for which purposes data relating to you will be processed and how you can manage your rights.

Below, you will find an explanation of general principles for the processing of personal data by Ford Otosan, the purposes for which your personal data is processed and the rights that you have concerning your personal data under the ConneCTruck System (“**ConneCTruck**” or “**System**”) and related services (“**Services**”) offered by Ford Otosan.

This Privacy Policy has been executed in both English and the applicable local language listed in ANNEX-3 to the Customer GTC languages. In the event of discrepancy between the English and the applicable local language, the English text shall prevail.

### General Information

While, being an entity located in the Republic of Turkey, Ford Otosan shall comply with the provisions of the Turkish Law No. 6698 on the Protection of Personal Data (“**Law No. 6698**”), the European General Data Protection Regulation (“**GDPR**”) and applicable national data protection law as far as these laws apply for the processing of personal data by Ford Otosan.

### Data Controller:

Ford Otomotiv Sanayi Anonim Şirketi

Akpınar Mahallesi, Hasan Basri Cad. No:2, 34885 Sancaktepe, İstanbul, Turkey

Company Registry No: 73232

### Representative for the EU:

Ford Otosan Romania S.R.L.

Henry Ford 1863-1947 street, no. 29, Dolj, Craiova, Romania

[gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr)

## Data Protection Officer of Ford Otosan:

You may approach the Data Protection Officer at [dpo@ford.com.tr](mailto:dpo@ford.com.tr) or by addressing a letter to the "Data Protection Officer" at the address of the Data Controller.

## What is Personal Data?

"**Personal Data**" means any information relating to an identified or identifiable individual (a data subject) in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

## How do we collect Personal Data?

If you use the ConnecTruck System, Ford Otosan may collect and process Personal Data required for the operation of the System, its management the provision of Services. Furthermore, Ford Otosan may collect and process Personal Data like your email address or phone number when:

- you contact Ford Otosan, or request that Ford Otosan contacts you, for any reason, or
- you submit your Personal Data to Ford Otosan for any reason.

## Which Personal Data do we collect?

We may collect information relating to the use of the System such as your name, contact details, System and contract status information (e.g. customer, user and driver records, contract information etc.), location information, vehicle information (e.g. vehicle data, VIN number, usage status and conditions), transaction information, your requests and complaints, incident management and other related information relevant for the System's operation and provision as well as development of related services.

We do not process special categories of Personal Data, as well as any biometric data.

## For Which Purposes Is Your Personal Data Processed?

The purpose of processing Personal Data is *to ensure functioning and development of ConnecTruck*. This purpose implies the following cases of Personal Data use:

- ***Within the scope of the Services and the maintenance and repair services provided;*** transferring and storing Personal Data, which is collected by the System's SIM embedded module, to cloud based application in order to process and track the Personal Data through global mobile communication networks;
- ***Within the scope of the processes for creating user identification;*** creating new user records within the ConnecTruck Customer Applications ("**Application**"), organizing

existing users registered on the Application, identifying the person or groups of persons to which notifications through the Application will be transmitted, registration on the Application by matching the vehicle and the user, the analysis of user records within the Application in order to ease subsequent use and, detection of unauthorized use and/or noncompliant use with the ConnecTruck General Terms and Conditions, and developing user-specific software by determination of the user's vehicle usage information and movements;

- ***Within the scope of processes for the remote monitoring of vehicle functions***; remote software or configuration update to electronic modules inside the vehicle, monitoring and transmission of the data, which is obtained via the module, on the GSM network, conducting preliminary analysis of geographical conditions by means of the topographic map, which is equipped within the vehicle, real-time determination of vehicle usage status and location, making system definitions in order to remote control some of the features of the vehicle, determination of the method of transmitting signals from vehicles and the groups of receptors, making notifications for the purpose of providing vehicle status communications, in some instances to carry out remote diagnostics activities, if necessary provide over-the-air updates to vehicle systems and for troubleshooting purposes;
- ***Within the scope of processes for monitoring and analyzing vehicle usage status***; determination of vehicle service requirements by taking all vehicle related factors, such as motor run time, tire pressure status and distance travelled, into account, categorizing vehicle error codes, maintenance planning according to service requirements of the vehicle, monitoring and analyzing the vehicle maintenance history, making decisions , predictions and notices regarding warranty, recall, service requirements of the vehicle and maintenance plans, making notifications regarding malfunctions and critical alarms,
- ***Within the scope of processes for reporting of vehicle conditions***; storage of data, which is obtained via sensors, mobile data devices and similar additional equipment within the System, in a convenient way to make relevant reporting, producing reports on vehicle usage status and location histories, producing reports by analyzing the average and total fuel consumption of the vehicle, and submitting relevant reports to users, carrying out analysis to measure vehicle performance status,

The following types of processing Personal Data are applied: collection, reception, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or transfer, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

You may find additional detailed information about the purposes of processing Personal Data by Ford Otosan on its Policy on the Processing and Protection of Personal Data, which has been made available to the public through the web address [www.fordtrucks.com.tr/en/policy-on-the-protection](http://www.fordtrucks.com.tr/en/policy-on-the-protection) .The aforementioned Policy on the Processing and Protection of Personal Data shall be applied in conjunction with this Policy. However, to ensure observance of the GDPR in case of its applicability, provisions of this Policy have always priority.

## **Legal Basis for Processing Personal Data**

Depending on the purposes of processing and the circumstances, in processing your Personal Data we may rely on the following legal bases in the priority of their order below:

- The processing is necessary in connection with any contractual relationship that you may enter into with us, including the operation of the System and the provision of the Services;
- The processing is required by applicable law;
- The processing is necessary to protect the vital interests of any individual;
- We have a legitimate interest in carrying out the processing for the purpose of managing, improving, operating or promoting our business (including the operation of the System and the provision of the Services) and our relationship with your employer, service partner or you, assessing the quality of the services we provide, and the services our suppliers provide to us or on our behalf, developing new and improved products, services, and business strategies, conduct research, protect or defend our or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues (If you like to receive detailed information on the legitimate interests on which we base our processing, please send us an e-mail to [gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr).); or
- We or your employer, principal or service partner have obtained your explicit prior consent to the processing.

We refer to Art. 6 para. 1 (a), (b), (c), (d) and (f) GDPR.

#### **Where May We Receive Your Personal Data From?**

Ford Otosan collects Personal Data directly from the individual and through the System. Ford Otosan also receives Personal Data from your employer, principal or services partner as well as Ford Otosan authorized dealers and services.

#### **Who May Access Your Personal Data?**

Ford Otosan processes the Personal Data alone or may give assignment to third parties to process your data. If we are involving data processors into the performance of our services and contractual obligations, we have entered into data processing agreements with them. Ford Otosan may also transfer your Personal Data within the scope of this Policy to you employer or your principal, to business partners, shareholders, affiliates, legally authorized public institutions and individuals and in particular to Ford Motor Company and Ford Otosan authorized dealers and services in order to realize the above-mentioned data processing purposes within the framework of this Policy.

Ford Otosan and some of its third parties are located outside the EU, which have not been subject of an adequacy decision of the EU commission pursuant to Article 45 GDPR. Ford Otosan will ensure that the level of data protection guaranteed by the GDPR will be upheld by

- Concluding EU Standard Contractual Clauses in accordance with Art. 46 para. 2 (c) GDPR.

Further information may be obtained by e-mail to [gdprrrep@ford.com.tr](mailto:gdprrrep@ford.com.tr) .

International transfer of your Personal Data is required in order to ensure that you benefit from the System and the Services; otherwise, it may not be possible to make full or partial use of the System and the Services.

### **How do we protect and store Personal Data**

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- pseudonymisation and encryption of Personal Data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident;
- a process for regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

### **Consequences in case we may not collect your Personal Data**

We need your Personal Data to enable the use of the System and to provide the Services in order to perform our contractual obligations with you. Without providing such Personal Data, we may not be able to operate the System and provide the Services you are intending to receive.

### **Consent and withdrawal**

Any consent is provided freely. If you give your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. After your withdrawal we will stop processing your Personal Data, including storage, unless further data processing is legally permitted.

To withdraw your consent, please send us an e-mail to [gdprrrep@ford.com.tr](mailto:gdprrrep@ford.com.tr) or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

### **Legitimate Interest and Right to Object**

You may object to the processing of your Personal Data based on legitimate interests of Ford Otosan or third parties. Unless your objection is directed solely against direct marketing by Ford Otosan, you have to explain your special situation, which makes the processing of your Personal Data based on legitimate interests unacceptable for you.

To object, please send us an e-mail to [gdprrrep@ford.com.tr](mailto:gdprrrep@ford.com.tr) or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

## **Retention**

We only keep your personal information in identifiable form for as long as one of the following applies:

- Your information is reasonably required in order to satisfy the purpose for which you submitted or we collected the information;
- Your information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant limitation period in your jurisdiction); or
- We are otherwise required to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please send us an e-mail to [gdprrrep@ford.com.tr](mailto:gdprrrep@ford.com.tr)

## **Your rights related to data privacy**

You have the right to request access to and rectification or erasure of your Personal Data, or restriction of their processing. Furthermore, you have the right to request data portability. If you are situated in the EU, you have the right to file a complaint to the relevant data protection authority.

If you have questions or concerns regarding our use of your information, or would like to exercise any of your rights, please send us an e-mail to [gdprrrep@ford.com.tr](mailto:gdprrrep@ford.com.tr) or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

## **Updates to this Privacy Policy**

We may modify or update this information from time to time. Please check [www.fordtrucks.com.tr/en/connectruck-privacy-policy](http://www.fordtrucks.com.tr/en/connectruck-privacy-policy) for the actual version of the data protection notice.