

FORD OTOMOTİV SANAYİ ANONİM ŞİRKETİ PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA WITHIN THE SCOPE OF THE CONNECTRUCK MOBILE APPLICATION

(“Privacy Policy”)

As Ford Otomotiv Sanayi Anonim Şirketi (“**Ford Otosan**” or “**Company**”) attributes great importance to the safe and transparent processing of your personal data in conformity with the law and good faith; this Privacy Policy (“**Policy**”) is prepared for objective of explaining how and for which purposes personal data relating to you has been processed and how you can manage your preferences.

Below, you may find a detailed description of general principles and the order of personal data processing performed by Ford Otosan, the purposes for which your personal data is processed and transferred and the rights that you have on your personal data under the ConnecTruck Mobile Application (“**ConnecTruck**” or “**Application**”) offered by Ford Otosan.

General Information

While, being an entity located in the Republic of Turkey, Ford Otosan shall comply with the provisions of the Law No. 6698 on the Protection of Personal Data (“**Law No. 6698**”), it recognizes and observes the principles and rules of the European General Data Protection Regulation (“**GDPR**”) and the German Federal Data Protection Act (*Bundesdatenschutzgesetz*) to the extent it is applicable to processing of personal data by Ford Otosan.

Data Controller according to Art. 4 para. 7 GDPR is:

Ford Otomotiv Sanayi Anonim Şirketi

Akpınar Mahallesi, Hasan Basri Cd. No:2, 34885 Sancaktepe/İstanbul

kvk@ford.com.tr

DPO: Ms Hayriye Karadeniz (hkaraden@ford.com.tr)

What is Personal Data

“Personal Data” means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, 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 natural person.

How we collect Personal Data

If you install and use the ConnecTruck on your phone or other device, Ford Otosan may collect and process Personal Data required for the operation of the App and management and fulfilment of the App services.

Further, 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 general use of the ConnecTruck such as identification information, contact details, location information, mobile device information, user transaction information, information about your vehicle, information about the security of your transactions, your legal transaction and compliance information, information on your requests and complaints, and your information on incident management, and other related information relevant to Ford Otosan's provision of the services, for the purpose of administration and error analysis to help Ford Otosan improve its services.

We do not process personal data which falls into the special categories, as well as any biometric personal data. We do not use your personal data to make legally significant decisions in respect of you based solely on automated processing of your personal data.

For Which Purposes Is Your Personal Data Processed?

Personal data processing is limited to what is necessary in relation to reaching a clear, predefined and lawful purpose stated below. Personal data processing is prohibited if such processing is incompatible with the purpose of the processing. Also we do not use the personal data for purposes other than declared in this Policy.

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

- ***Within the scope of the processes for creating user identification***; creating new user records for the purposes of benefiting the users of the services provided in the Application (“**Services**”), 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, developing user-specific software in the future by determination of the user's vehicle usage information and movements, and 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 Mobile Application Undertaking,
- ***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, determination of the method of transmitting signals from vehicles and groups of receptors, making notifications for the purpose of providing vehicle status communications,
- ***Within the scope of processes for monitoring and analyzing vehicle usage status***; determination of vehicle service requirements by taking all the vehicle related factors such as motor running times, tire pressure status and distance traveled, into account, categorizing vehicle error codes, maintenance planning according to service requirements of the vehicle, tracing and analyzing the

vehicle maintenance history, making decisions, predictions and notices regarding warranty, recall, service requirements of the vehicle and maintenance plans, making declarations regarding malfunctions and critical alarms,

- ***Within the scope of processes for reporting of vehicle conditions***; storage of data, which is obtained via sensors, modules and similar additional equipment within the Application, 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,
- ***Within the scope of the procedures regarding the implementation of the basic functions necessary for the Application to perform***; increasing the performance and functionality of the Application and adjusting and testing by analyzing the data obtained via your mobile device, on which the Application is installed, examining, categorizing error codes that may occur in the Application and performing convenient interventions, logging the users' preferences for remembering the language, user name and password related to the Services, and ensuring that the Application is used in accordance with such preferences,
- ***Within the scope of the processes relating to direct or indirect marketing***; the customization, development and reconstruction of the products or services in accordance with the related person's preference, likes and usage habits, realization of targeted advertising, promotion and campaign communications with real time location detection, carrying out data analytics and market analysis studies in order to determine the strategies and target audience regarding marketing activities.

In the meaning of Personal Data Law, the following operations with personal data are applied: *collection* (in case a personal data subject provides personal data to Ford Otosan directly), *recording, systematization, accumulation, storage, specification (update, alteration), retrieval, use, transfer, depersonalization, blocking, erasure, destruction*.

You may find additional detailed information about the purposes of processing personal data by our Company on the Ford Otomotiv Sanayi Anonim Şirketi Policy on the Processing and Protection of Personal Data, which has been made available to the public through the web

address https://www.fordotosan.com.tr/documents/Kurumsal_Politikalar/Ford-Otosan-Policy-On-The-Protection-and-Processing-of-PII.pdf. The aforesaid Policy on the Processing and Protection of Personal Data shall be applied in conjunction with this Policy. In part of observing of the applicable rules provided by the GDPR, provisions of this Policy have priority over the text of the aforesaid Policy on the Processing and Protection of Personal Data.

Lawful basis for processing of Personal Data

In processing your Personal Data in connection with the purposes set out in this Privacy Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- we have obtained your explicit prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way);
- the processing is necessary in connection with any contractual relationship that you may enter into with us;
- the processing is required by applicable law;
- the processing is necessary to protect the vital interests of any individual; or
- we have a legitimate interest in carrying out the processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

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 assign third parties to processing we would include information about them into this Policy, for example, by means of a corresponding link. Ford Otosan also may transfer your personal data within the scope of this Policy to business partners, shareholders, affiliates, legally authorized public institutions and private persons and in particular to Ford Motor Company and Ford Otosan authorized services in order to realize the above-mentioned data processing purposes within the

framework of the personal data processing conditions. We may use further data processors during the operation of the ConnecTruck. When we are involving data processors into the performance of our services and contractual obligations and such involvement requires the sharing of Personal Data, we have entered with the data processors into data processing agreements.

Ford Otosan and some third parties are located in countries in which the level of data protection is not adequate to the GDPR. Ford Otosan ensures that the level of protection of natural persons guaranteed by the GDPR is not undermined. The list of third parties and safeguards can be obtained by e-mail to kvk@ford.com.tr

International transfer of your personal data is required, in order to ensure that you benefit from the Services; otherwise, it may not be possible to make full or partial use of the Services. Therefore, we can perform such transfer to achieve the purpose defined in the Policy.

By Which Method Is Your Personal Data Obtained?

In this context, personal data processed by our Company, means the information with the nature of personal data, which you have provided through the Application by means of your vehicle(s) with the Application in-use, their peripheral equipment and the mobile devices on which the Application is downloaded, and the new information within the scope of reports generated upon this information.

How 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 ConnecTruck and to provide the services offered via the ConnecTruck in order to perform our contractual obligations with you. Without providing such Personal Data, we may not be able to 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 required and legally permitted. This paragraph is only relevant for processing that is entirely voluntary – it does not apply for processing that is necessary or obligatory in any way, as is for example the case with regard to Personal Data required for the installation and the operation of the ConnecTruck.

To withdraw your consent, please send us an e-mail to kvk@ford.com.tr or a letter to Akpınar Mahallesi, Hasan Basri Cd. No:2, 34885 Sancaktepe/İstanbul

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 kvk@ford.com.tr or a letter to Akpınar Mahallesi, Hasan Basri Cd. No:2, 34885 Sancaktepe/İstanbul

When we erase your Personal Data

We erase your Personal Data automatically when they are no longer required for the purposes listed above. We also erase your Personal Data according to your request and if further storage is neither required nor permitted by applicable laws. Further storage only occurs as long as and as far as it is designated by the EU or Member States legislation in EU Acts, Law, or other regulations, that Ford Otosan is subject to.

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 in the EU you have the right to file a complaint to the relevant data protection authority.

You have the right to obtain from us the information as to whether Personal Data concerning you are being processed, the purpose of the processing and the categories of Personal Data concerned. A copy of the Personal Data undergoing processing can be requested.