



PORSCHE

## General Data Protection and Privacy Statement My Porsche and Porsche Connect Store

We, Porsche Smart Mobility GmbH (hereinafter “we” or “PSM GmbH”), are pleased that you are visiting our website and pleased about your interest in our company and our products. Protecting your privacy when processing data is important to us. We take protecting your personal data and handling them confidentially very seriously. The processing of your personal data is only takes place within the scope of legal requirements of data protection law of the European Union, in particular, the General Data Protection Regulation (GDPR). With this privacy policy, we inform you about the processing of your personal data and your privacy rights in the context of the use of My Porsche, our Porsche Connect Store, and Porsche Connect Services (hereinafter, “Porsche Digital Service Infrastructure”). For information on other services and offers from other companies of the Porsche Group, please refer to the respective privacy policy of those services or companies.

### 1. Controller and data protection officer; contact information

The controller within the meaning of data protection and privacy laws is:

Porsche Smart Mobility GmbH  
Porscheplatz 1  
70435 Stuttgart  
Germany.

If you have any questions or suggestions about data protection, you can e-mail us at [smartmobility@uk.porsche.com](mailto:smartmobility@uk.porsche.com), or the data protection officers directly at [dataprotectionofficer.smartmobility@porsche.com](mailto:dataprotectionofficer.smartmobility@porsche.com), or write to the postal address below.

Porsche Smart Mobility GmbH  
Data Protection Officer  
Porscheplatz 1  
70435 Stuttgart  
Germany

### 2. Subject matter of data protection

The subject matter of data protection is personal data. This means any information concerning an identified or identifiable individual (the data subject). This includes, for example, information such as name, postal address, e-mail address or telephone number, and also information that necessarily arises during and via the use of My Porsche, our Porsche Connect Store and the Porsche Digital Service Infrastructure, such as details about the start, end and scope of use of our website and your IP address.

### 3. Type, scope, purpose and legal basis of data processing when using our websites

Even if you use our website without logging in, data will be or may be collected. The text below provides an overview of the different

types of collection and processing of data and the respective purposes of processing and legal bases.

#### 3.1 Automated data collection

When you access our website, your Internet browser automatically transfers data for technical reasons. The following data are stored separately from other data that you may transmit to us:

- date and time of access
- duration of the visit to our website
- type of Web browser / Web browser version
- operating system used
- the pages you visit on our website
- volume of data transmitted
- nature of event
- system crashes and similar events
- IP address
- domain name

This data is processed on the basis of article 6 subparagraph 1. point (f) of the GDPR to provide the service, to ensure technical operation and detect and eliminate interference. We thereby pursue the interest in enabling the use of our website and its technical functionality. When you visit our website, this data will be processed automatically. Without this provision, you will not be able to use our services. We do not use this data for the purpose of drawing conclusions about you.

We normally delete this data after 13 months, unless by way of exception we need it for the purposes set out above. In such cases, we will delete the data immediately after the purpose ceases to exist.

In addition, this data is also processed without being assigned to a specific person for the purposes of analysis and performance improvements. See paragraphs 3.2 and 3.3. for more detail.

#### 3.2 Data processing for improvement of our online offer

The automated data we collect mentioned in paragraph 3.1 is furthermore used to improve the performance of Porsche Digital Service Infrastructure, to ensure the availability of our platforms, to optimise user experience, to further evaluate your use of the website, to compile reports on website activities for us, and to provide other services related to website and internet usage.

We process your data based on our legitimate interest in the performance and availability of our products, as well as in the analysis of the use behaviour of our website visitors. The data will be stored for 13 months and not assigned to any particular person. In addition, we store cookies as part of the processing described here. See paragraphs 3.3 for more detail.

#### 3.3 Cookies

When you visit our website, so-called "cookies", i.e. small files, can be stored on your device in order to offer you a comprehensive range of functions to make your use more convenient and to optimise our offers. If you do not wish to use cookies, you can prevent their storage on your device by means of the corresponding settings on your Internet browser or use separate options for objecting to their processing. Please note that the functionality and functionality of our offer may be limited. For detailed information on the nature, extent, purposes, legal bases and possibilities of contradicting the processing of cookies, please refer to our Cookie Policy.

We process information about our users via cookies to fulfill the contract with our users and for our legitimate interest in the user-friendly and secure provision of our websites.

#### **4. Registering for your Porsche ID user account**

When you register for and use My Porsche, the Porsche Connect store, and the Porsche Digital Service Infrastructure, personal data are collected, processed, and used, and may be transmitted to third parties as described below, in order to provide you with all services with regard to My Porsche, the Porsche Connect store, and the Porsche Digital Service Infrastructure and to fulfill our contractual obligations that exist in this context. We perform all of the data processing described in this section either - to the extent indicated - based on your consent or to fulfill our contract with you.

##### 4.1 Registration process

To use My Porsche, registration on the Porsche infrastructure is required. Registration can take place in two ways, and you are free to choose the method of registration:

###### **1. Invitation to register from authorized dealer**

If you wish, your authorized dealer will enter the data you have communicated to the dealer for you via the dealer's access to our systems. In this case, you will then receive, for example, a link sent by e-mail via which you are required to confirm your registration. Please note that the authorized dealers are independent companies, and we have no influence over them. A second feature will be used for additional verification. One example is a code sent via text message that you then enter in My Porsche.

###### **2. Self-registration**

In the event that registration has not taken place via an authorized dealer, you can register yourself and enter your data on your own. In selected countries, you can also add a vehicle and use additional digital services that require vehicle ownership. To do this, you will also have to upload a copy of an identification document and proof of ownership and – if you are not the owner of the vehicle – a power of attorney from the vehicle owner after entering your vehicle identification number. These documents will be reviewed based on our verification criteria. As proof of successful verification, we will also store the names, dates of birth, places of birth, addresses, and validity information of the documents shown in the respective identification documents and the vehicle identification numbers, owner names, and addresses shown in the ownership documentation. After the verification process is complete, the copies of the documents will be deleted. Following successful verification, you will receive, for example, a link sent by e-mail via which you are required to confirm your registration. A second feature will be used for additional verification. One example is a code sent via text message that you then enter in My Porsche.

###### **(a) Required information during registration**

When you register on My Porsche, you will be required – in case of self-registration – to enter your e-mail address (Porsche ID), a password, your name and any titles and suffixes, contact and address information, mobile phone number, and, where applicable, the language in which you wish to communicate with us or – in case of registration through an authorized dealer – to confirm this information in My Porsche. This information is necessary in order

to set up and manage a Porsche ID user account for you so that you can use the full range of services and functions offered by My Porsche and the Porsche Connect store. In selected countries, you can also use our offerings as a potential customer. In this case, you are only required to state your name, e-mail address, and a password. We need this information – and, where applicable, further information – not least in order to be able to respond to requests, questions, and criticism.

We also store the time of your last login.

During registration, we will perform a plausibility check of your name and address information.

###### **(b) Voluntary information during registration**

Within the scope of your registration, you will also have the opportunity to enter additional voluntary information, such as additional name information (e.g. academic titles, etc.), company contact information, date of birth, additional phone numbers, credit card information (this information is stored exclusively by the payment service provider), and your vehicle license plate number and a personal vehicle name. You can also provide information on your interests and preferences and your desired contact channels. Please note that this information is not required in order to register, and that it is entirely up to you to decide whether you wish to communicate this information to us.

##### 4.2 Porsche Digital Service Infrastructure: data processing after registration

If you have registered for a Porsche ID user account, we will exchange basic information about your user account and your vehicles with responsible Porsche dealers in order to be able to serve you via our dealer organisation. In addition to the vehicle identification number, we transfer your user name (Porsche ID), the technical or sales availability of services and product offers for your user account or vehicle, as well as relevant events as part of the creation, modification or deletion of your user account, the linking of vehicles, the selection of traders, or the activation or deactivation of services.

If you have selected an authorised dealer and provided your consent, your personal data stored with My Porsche, in particular contact data, support, contractual and service data, as well as data about your interests, vehicles and services used will also be exchanged with the authorized dealer and with synchronised with any personal data stored about you. If you no longer wish data to be transferred in the future, you can change this accordingly in your user settings. The aforementioned data will no longer be exchanged with the authorised dealer from that date. For technical reasons, both your consent and the termination of data exchange may take up to 24 hours to take effect. The legal basis for processing your data in this connection is your consent.

##### 4.3 Deletion of your Porsche ID user account

If you delete your Porsche ID user account, your My Porsche profile will also be deleted. As far as data must be stored for legal reasons, these are blocked (so-called processing limitation). The data is for further use, especially for the use of services, and then is no longer available. The functionality of the services may be limited or eliminated. My Porsche will then no longer be available to you. If further responsible individuals within the Porsche Group and its sales organisation process personal data within their own responsibility, the processing of this data remains unaffected. If, on the basis of your consent, data has been exchanged with a dealer of your choice, we inform the dealer about the deletion of your Porsche ID user account.

#### **5. Recipients of personal data**

**Internal recipients:** Within Porsche Smart Mobility GmbH, only those persons who need this for the purposes mentioned in paragraph 3 above have access.

**External recipients:**

We only pass on your personal data to external recipients outside of Porsche Smart Mobility GmbH if this is necessary for the provision of the respective Porsche Digital Service offer, if another legal licence exists, or if we have your consent.

External recipients may include:

a) Processors:

Porsche AG group companies, or external service providers we use for the provision of services, for example in the areas of technical infrastructure and maintenance for the Porsche Smart Mobility GmbH offer. These processors are carefully selected by us, and regularly checked, to ensure that your privacy is maintained. The service providers may only use data for the purposes specified by us.

b) Public bodies

Authorities and state institutions, such as public prosecutors, courts or financial authorities, to whom we must transfer personal data for legal reasons. Transfer takes place on the basis of article 6 subparagraph 1. point (c) of the GDPR.

c) Private bodies

Dealers, cooperation partners or support personnel to whom data is transferred on the basis of consent, for the execution of a contract with you, or for the protection of legitimate interests, such as Porsche Centres, financing banks, other service providers or transport service providers. Transfer takes place on the basis of article 6 subparagraph 1. points (a), (b) and/or (f) of the GDPR.

## 6. Data processing in third countries

If individual functions within the Porsche Digital Service Infrastructure are performed on our behalf by service providers whose registered location or place of data processing is not located in a Member State of the European Union or another state that is a signatory to the Agreement on the European Economic Area, we ensure before disclosure that there is either an adequate level of data protection and privacy within the recipient's organization (e.g. through self-certification on the recipient's part for the EU-US Privacy Shield or agreement of "EU standard contractual clauses" with the recipient) and/or that your consent has been received in sufficient form.

You can contact us to receive an overview of the recipients in third countries and a copy of the specific contractual provisions that have been agreed to ensure an adequate level of data protection and privacy. To do this, please use the information stated in Sec. 1.

## 7. Further services for My Porsche

### 7.1 Handling payment information

To process payments for paid offers within the framework of My Porsche and Porsche Connect, we use the payment service provider Arvato Distribution GmbH, Gottlieb-Daimler-Str. 1, D-33428 Harsewinkel ("Arvato"). Management of your credit card information as well as the processing of payments is carried out exclusively via systems of the payment service provider. If you enter your credit card information, this is done directly via an input field of the payment service provider, who stores this information independently, and uses it for your payments. We do not collect and store any credit card information from you. Please inform the payment service provider about the type, scope and purpose of the collection and use of your credit card information.

Exclusively for the purpose of debtor management (including compliance checks, where legally required) and to carry out credit checks, the payment service provider processes your customer and contact information (name, address, e-mail address, Porsche Connect customer number, and if applicable, company and affiliates) on our behalf, and your vehicle identification number. The legal basis for the processing of your data for the above purposes

is the fulfilment of a legal obligation that we are subject to, or our legitimate interest in complying with legal requirements.

### 7.2 Care through the Contact Centre

You have the opportunity to be supported by our contact centre when using the Porsche Digital Service Infrastructure. For example, you can have changes made to your personal customer data, as well as online service bookings, and other services through our telephone contact centre. To do this, you must provide your Porsche ID to the contact centre. After identifying yourself by naming your Porsche ID or other security features, the contact centre accesses your Porsche ID user account or My Porsche directly and makes the desired changes/activities on your behalf. The contact centre staff only perform the tasks that you explicitly want. In addition, if you have consented to be contacted through the appropriate channels, the contact centre may actively contact you by phone/SMS/E-mail/instant messaging as required, to assist with registration, service activation and use.

The legal basis for processing your data via the Contact Centre is fulfilment of the contract.

### 7.3 Provision of service and warranty information

In order to provide you with information about your vehicle, ongoing warranties and recall campaigns in My Porsche, we process equipment and vehicle master data, such as the vehicle identification number, ongoing warranties, the model year and a model image. The processing of your personal data takes place for fulfilment of our contract with you. The aforementioned data is provided to us for this purpose for the duration of the existence of your vehicle relationship.

### 7.4 Service appointment request

To request service appointments with Porsche dealers and service companies via My Porsche, we may provide customer and vehicle data to companies of your choice at your request. If you provide us with your consent to do so as part of a service request via My Porsche, we will provide your name, address, telephone number, e-mail address, Porsche ID, vehicle identification number, vehicle model, the service dates you have selected, the scope of service you desire, and a supplementary message to your inquiry from you, as well as the desired contact channels for the dealer or service company chosen by you for the relevant inquiry. The transfer of your personal data is based on your consent once, within the context of the relevant service request.

We store your respective service request for fulfilment of our contract with you for the duration of the existence of your user account.

## 8. Rights of data subjects

As the subject of data processing, you have numerous rights. Specifically:

**Right to information:** You have the right to receive information regarding the data we store regarding you personally.

**Right of rectification and cancellation:** You may demand the correction of incorrect data, and insofar as the legal requirements are met, the deletion of your data.

**Data portability:** If you have provided us with data based on a contract or consent, you may, subject to legal requirements, require that you receive the data you provide in a structured, common and machine-readable format, or that we transfer it to another person in charge.

**Objection to data processing in the case of the "legitimate interest" legal basis:** You have the right, for reasons arising from your particular situation, to object at any time to the processing of

data by us, insofar as this is based on the legal basis "legitimate interest". If you make use of your right of objection, we will stop processing your data, unless we can prove, in accordance with the legal requirements, compelling legitimate reasons for further processing that outweigh your rights.

**Opposition to cookies:** You may also object to the use of cookies at any time. Details can be found in our cookie policy.

**Revocation of consent:** To the extent that you have issued a statement of consent to the processing of your data to us, you can revoke it at any time, with effect for the future. The legality of the processing of your data up until the time of revocation will be unaffected by this.

**Right to complain to the supervisory authority:** You can also file a complaint with the relevant supervisory authority if you believe the processing of your data violates applicable law. To do this, you can contact the data protection authority with jurisdiction over your place of residence or country or the data protection authority that has jurisdiction over us.

**Your contact with us:** In addition, you can contact us free of charge if you have any questions regarding the collection and/or processing of your personal data, your rights as a data subject, and/or any consent that may have been granted. To exercise any

of the rights mentioned above, please contact [smartmobility@gb.porsche.com](mailto:smartmobility@gb.porsche.com) or use the mailing address specified in Sec. 1 above. When contacting us, please make sure we are able to clearly identify you personally.

#### **9. Data security**

We provide for all necessary technical and organizational measures, in accordance with the state of the art, in order to ensure a level of protection appropriate to the risk in compliance with the applicable statutory requirements.

#### **10. Links to offers from third parties**

Websites of other providers that are linked to from this website were and are designed and provided by third parties. We have no influence over the design, content, or functionality of these linked websites. We expressly distance ourselves from all content of all linked websites. Please note that the third-party websites linked to from this website may install cookies of their own on your end device and/or collect personal data. We have no influence over this. Please contact the providers of these linked websites directly as appropriate for information in this regard.

Last updated: 01.08.2018

## **Specific Data Protection and Privacy Statement My Porsche Services and Porsche Connect Services**

In My Porsche or the Porsche Connect store, you can request My Porsche services or Porsche Connect services and activate service licenses. To do this, you must be registered with My Porsche and have a Porsche ID user account. Depending on the service, you can use and manage My Porsche services and Porsche Connect Services via various Porsche apps and My Porsche, and if available for your vehicle, in your vehicle via wireless network connection.

### **1. Requesting and activating services**

You can request individual or multiple My Porsche services and Porsche Connect services and activate service licenses. When you select the respective service or service package, you can also view the specific information on the collection, processing, and use of data within the scope of the service in question under the product descriptions for the individual services. To perform and fulfill a request and the contractual relationship with you that is associated with it, we process and use not only the relevant request information, but also your personal data that were collected upon registration. You can change your billing address before the request process is complete. In this case, we will use this address information that you have provided for billing and invoice processing purposes.

To process payments for paid services within the scope of My Porsche and Porsche Connect, we use the payment service provider Arvato (see Sec. 5 of the General Data Protection and Privacy Statement for My Porsche and the Porsche Connect Store). The management of your credit card information and processing of payments are performed exclusively via systems of the payment service provider. When paid services are requested, we transmit to the payment service provider the amount invoiced and a one-time transaction key that can be used to allocate your payment for purposes of processing the payment. To the extent that you enter your credit card information within the scope of requesting services, this takes place directly via an entry field of the payment service provider, which stores this information independently and uses it for your payments. We do not collect or store any of your credit card information whatsoever. Therefore, please consult the payment service provider for information on the nature, scope, and purpose of the collection and use of your credit card information. For further information regarding the handling of credit card information and processing of payments, please see the General Data Protection and Privacy Statement for My Porsche and the Porsche Connect Store.

After the request process is complete, you can activate the services. When you do this, the authorization for use will be stored by the system, and the list of available services will be updated accordingly.

In order to use certain Smart Mobility Services (e.g. charging station offers), a personalised card (Porsche ID Card) containing RFID chips is sent by post in many countries when purchasing a product. After delivery, the card needs to be activated on the My Porsche portal and can then be used for authentication with the supported infrastructure (e.g. public charging station). An identification number is stored on the card, which can be used to assign you to your user account. No personal data, in particular your name or address, is stored digitally on the card itself, beyond the identification number.

If lost, the card can be blocked on the My Porsche portal by the user.

Unless stated otherwise, we carry out the processing described in this section for fulfilment of our contract with you on the basis of article 6 subparagraph 1. point (b) of the GDPR.

### **2. Use of the My Porsche services and Porsche Connect services**

You can use the My Porsche services and Porsche Connect services that have been requested, depending on the service, in your vehicle (to the extent available for your vehicle) via wireless network connection or via further end devices in My Porsche, your Porsche Connect app, and the Porsche Car Connect app and, where applicable, also from multiple or all access points. To this end, your vehicle or the respective end device will connect to the Porsche Digital Service Infrastructure.

If you use the online services requested via My Porsche or the Porsche Connect store in your vehicle or on further end devices, we will process personal data of yours for purposes of enabling the use of the online services, for support purposes, and for further specifically defined purposes. Unless otherwise noted, we collect, process, and use your personal data only within the scope necessary to enable the use of the respective My Porsche service or Porsche Connect service.

During use of the individual My Porsche services or Porsche Connect services, the following categories of personal data are processed, depending on how the specific service works, in order to provide you with the services in this context and to implement and fulfill the associated contractual relationship with you. The legal basis in each case is contract fulfillment.

- a) Identification information, such as the vehicle information number, your Porsche ID, and device and system IDs of your end devices and mobile radio modules that are needed in order to identify you personally or to identify your end device or vehicle to establish connections, for the use of services, or for access to content.
- b) Authorization information that includes the fact that the vehicle or the relevant end device has been activated for the respective Porsche Connect service and that can be associated with your registration data from the Porsche Digital Service Infrastructure.
- c) Login information that is needed when you wish to use services of other providers that require a login in your vehicle or on further end devices.
- d) Communication information that is necessary in order to establish a connection between your vehicle and/or other end devices and our servers or with the servers of third-party providers of content for Porsche Connect services.
- e) Location and movement information that is necessary in order to display location-related content in the vehicle.
- f) Voice data that enable voice control and voice entries in certain Porsche Connect services. Voice data are transferred to us from the vehicle or an end device in recording form for the purpose of conversion to text. The text that is then generated by a service provider is transferred back to the vehicle, and the recording is subsequently deleted at our end.
- g) Contact information that is used in communication services, for example to send an e-mail or text message.
- h) Billing data such as an itemised bill from charging operations: If necessary, we will combine this information with your address and payment information for individual billing purposes.
- i) Further content that must be exchanged with us or with service providers in order to be able to perform a service for you.

For detailed information on which data are collected and processed within the scope of which online service, please see the relevant

online service descriptions at <https://connect-store.porsche.com/gb/en/>.

We store the service call in connection with your vehicle identification number and a time stamp for a period of 12 months as a database for creating anonymised use statistics.

### 3. Use of services of a third-party provider

If you use services of third-party providers that you cannot request via My Porsche or the Porsche Connect store, content from these services may be displayed in your vehicle or on your end device, and information may be exchanged between your vehicle or end device and the service provider. By linking a mobile end device with your vehicle, content will only be reflected in your vehicle's built-in infotainment system (Porsche Communication Management, or PCM). We do not access these services of third-party providers, nor do we take note of any content. Therefore, please note the relevant data protection and privacy information provided by the third-party provider.

When you use such third-party services, it is possible that personal data will also be used beyond the scope necessary to perform the service and for the proper functioning of the service.

We have no influence over the processing of data by these third-party providers or over the location of data processing. Therefore, please consult the relevant third-party providers for information on the nature, scope, and purpose of the collection and use of personal data with regard to the respective online service.

We perform all of the data processing described in this section, namely the transfer to the third-party provider, in order to fulfill our contract with you.

### 4. Special notes on using the Porsche Connect services in the vehicle

The PCM built into your vehicle and the mobile interface for vehicle-related services ("Connected Gateway," or cGW) may, to the extent available for your vehicle, be connected with the Porsche Digital Service Infrastructure via wireless network connections. They enable you to use Porsche Connect services that you have requested via our Porsche Connect store, along with using third-party services that you have requested elsewhere, independent of our offerings, in your vehicle.

#### 4.1. Connectivity

Depending on the features of your vehicle, connectivity can be established by dialing into the vehicle interfaces via a Wi-Fi connection provided by an external device or via the wireless network module of your vehicle's PCM. Depending on the features of your vehicle, the wireless network module of your vehicle's PCM may have an installed or pre-installed insertable SIM card or a permanently installed SIM card.

Unless expressly noted otherwise, we perform all of the data processing described in this section to fulfill our contract with you.

##### 4.1.1 Definitions

- a) Installed insertable SIM card  
Depending on the features of your vehicle, you can establish connectivity in your vehicle yourself by way of a SIM card that you install in the vehicle and that you have received from your respective wireless network provider ("installed insertable SIM card"). Your respective wireless network provider is responsible for your own installed insertable SIM card and the data-processing processes associated with it. Please contact your respective wireless network provider for information on the nature, scope, and purpose of the collection, processing, and use of data and on data security during signal transmission.
- b) Pre-installed insertable SIM card

Depending on the features of your vehicle, connectivity can be provided by an insertable SIM card that the manufacturer has already pre-installed for you ("pre-installed insertable SIM card"). For more information on country availability, please see <https://connect-store.porsche.com/gb/en/>.

##### c) Permanently installed SIM card

Depending on the features of your vehicle, connectivity can be established by a SIM card that has already been installed directly in your vehicle by the manufacturer and that is not replaceable ("permanently installed SIM card"). A permanently installed SIM card cannot be removed manually to stop connectivity. For information on responsibilities for the data-processing processes in connection with the permanently installed SIM card, please see Sec. 4.1.3 below.

##### d) Network operator and virtual network operator

The (telecommunication) "network operator" operates a telecommunication network and provides the respective participants with access to this network. The "virtual network operator" puts together individual network solutions based on the infrastructures and technologies of various network operators without possessing a network infrastructure of its own.

#### 4.1.2 Data storage during vehicle production

If your Porsche vehicle is equipped with a pre-installed insertable SIM card or a permanently installed SIM card, we store the SIM card numbers (ICCID, IMSI, MSISDN), in conjunction with the respective device and vehicle identification number, during the vehicle production process. This data storage takes place for the purpose of managing SIM card numbers and to match the vehicle with a SIM card number in the event that government agencies request information from Porsche Smart Mobility GmbH, for example.

#### 4.1.3 Data exchange in the case of permanently installed SIM cards

Wireless network modules in Porsche vehicles with permanently installed SIM cards that are active dial in, where available, to wireless networks of the respective network operator – regardless of whether you are registered for Porsche Connect or have requested Porsche Connect services. Telecommunication data (data collected, processed, and used based on the provision of the telecommunication service or to establish connectivity) may be exchanged for the purpose of the wireless network connection or to establish connectivity and, where applicable, to perform the relevant online functions of the Porsche Connect services you have requested in your vehicle via the wireless networks of the respective network operator, e.g. with wireless cells.

Within the scope of the wireless network connection, it is not impossible that when signals are transmitted via public telecommunication networks outside your vehicle, third parties, especially network operators, can access certain information and potentially determine your location. In addition to the respective network operator, virtual network operators may also have access to this information in the process.

Provision of connectivity via permanently installed SIM cards takes place through the following virtual network operator:

- CUBIC Telecom, Cubic Telecom Limited, Corrig Court, Corrig Rd, Sandyford Industrial Estate, Dublin 18, Ireland.
- Vodafone GmbH, Ferdinand-Braun-Platz 1, 40549 Düsseldorf, Germany.

Please contact the virtual network operator for information on the nature, scope, and purpose of the collection, processing, and use of data and on data security during signal transmission.

#### 4.1.4 Data processing within the scope of telecommunication services

We collect, process, and use your inventory data (such as your name, address, and date of birth) that are collected during registration for My Porsche or the Porsche Connect store or indicated when you request a telecommunication service in My

Porsche or the Porsche Connect store to establish, amend, or terminate a contractual relationship regarding telecommunication services or to design the content thereof. The aforementioned data are stored for these purposes until the end of the calendar year following termination of the contractual relationship at the latest.

Traffic data generated within the scope of the activity of the wireless network connections (such as the start and end of the respective connection), location data on the mobile connection, the end points of the connection and dynamic IP addresses, are not collected, processed, or used within the Porsche Digital Service Infrastructure, with the exception of SIM card and device numbers and the volume of data used. Please contact the respective network operator for information on the nature, scope, and purpose of its collection, processing, and use of data.

#### 4.1.5 Data processing within the scope of further connectivity services

If you request or have requested expanded connectivity services, such as Wi-Fi packages, activation and deactivation information is exchanged between our system, your vehicle's wireless network interface, and the virtual network operator for the purpose of activating and deactivating the data packages of the permanently installed SIM card in Porsche vehicles.

To manage the pre-installed insertable SIM cards and permanently installed SIM cards in Porsche vehicles and to calculate the volume of data available to you and the volume of data used within the scope of any data package you may have requested, the vehicle identification number, your SIM card numbers, the associated SIM card status and, where applicable, the volume of data used and remaining in the respective period are additionally exchanged between our system, your vehicle's wireless network interface, and the virtual network operator and stored by us for the duration of the respective contractual relationship. We also store the aforementioned data for a period of 12 months as a basis for generating anonymized use reports.

#### 4.1.6 Further data processing due to legal obligations

Beyond the data processing described in Sec. 4.1.3 through 4.1.5 above, we collect, process, and use telecommunication data (data that are collected, processed, and used based on the provision of the telecommunication service and/or to establish connectivity) only based on and in compliance with applicable legal obligations that apply to us – for example, to fulfill our statutory obligations to store personal data for, and release personal data to, security and law enforcement agencies.

The legal basis for the processing of your data is the fulfillment of a legal obligation that applies to us and/or our legitimate interest in complying with statutory requirements.

#### 4.1.7 Identity checks

In some countries, it may be necessary to perform an identity check based on an identification document for legal reasons in order to request certain telecommunication services. We use the external service provider IDnow GmbH, Auenstr. 100, 80469 Munich, Germany, to perform these identity checks. The collection, processing, and use of data in connection with the identity check are performed exclusively by and on the responsibility of the external service provider. Please contact the external service provider for information on the nature, scope, and purpose of the collection, processing, and use of data. You can find this information [here](#).

To perform the identity check, you will be redirected to the service provider's external site as part of the service request process. At your prompting, we will transmit the information that is to be verified (your name, address, and date of birth) to the service provider, along with a procedure number in order to be able to match up the result of the identity check later on. Following the identity check, the service provider will let us know the result of the identity check under the procedure number. We do not transmit personal data

from this identity check to third parties except where we are legally obligated to do so. We also receive access to a copy of your identification document stored by the service provider in these cases only, in order to fulfill our statutory obligations.

The legal basis for the processing of your data is the fulfillment of a legal obligation that applies to us or our legitimate interest in complying with statutory requirements.

#### 4.2. Setting up a vehicle and establishing a vehicle connection

To be able to use services in your vehicle, your vehicle must be stored in your Porsche ID user account. To this end, you need to enter the vehicle identification number in My Porsche or have this done by your authorized dealer. We will process your vehicle identification number for purposes of verification, to establish a vehicle connection and to match it up within the scope of use of the services, to activate and provide services, and for further purposes defined and explained in detail in the relevant locations. To ensure that you can connect your vehicle to the Porsche Digital Service Infrastructure, our system creates and stores a "pairing code" that is displayed to you in My Porsche.

For verification purposes, you will also have to upload a copy of an identification document and proof of ownership and – if you are not the owner of the vehicle – a power of attorney from the vehicle owner after entering your vehicle identification number or present these items to your authorized dealer. These documents will be reviewed based on our verification criteria. As proof of successful verification, we will also store the names, dates of birth, places of birth, addresses, and validity information of the documents shown in the respective identification documents and the vehicle identification numbers, owner names, and addresses shown in the ownership documentation. After the verification process is complete, the copies of the documents will be deleted.

After your vehicle has been matched with your Porsche ID for the first time or a subsequent time, the vehicle must be connected to the Porsche Digital Service Infrastructure. To do this, enter the "pairing code" shown in My Porsche in your vehicle's PCM. In response, your vehicle's PCM will first use the pairing code and vehicle identification number to log into our system. We need this information to be able to associate your vehicle with your Porsche ID user account during use, meaning, for example, when a service is accessed, and check whether it is authorized to use services. Once a successful match has been made, our system will transfer a list of currently available services to your vehicle's PCM.

To use services that are especially critical to safety and security, you will have to enter a separate four-digit PIN. You can set up your personal PIN in My Porsche and change it there at any time. The PIN is stored with encryption. When you enter the PIN in your vehicle, it is also encrypted and transmitted to our system for the purpose of checking authorization.

We process your data to fulfill our contract with you.

#### 4.3 Retrieving the list of available services and accessing services

Each time you start or end a trip, and when you select certain services, your vehicle's PCM will first use the vehicle identification number to log into the Porsche Digital Service Infrastructure. We need this information to be able to associate your vehicle with your Porsche ID user account and check whether it is authorized to use services. When you log in to start and end a trip, a current list of available services will also be transmitted to your vehicle's PCM. We process your data to fulfill our contract with you.

As a data basis for generating anonymized usage statistics, we store and use the retrieval of the list of available services and the respective service access in connection with your vehicle identification number and a time stamp for a period of 30 days. The legal basis for the processing of your data is our legitimate interest in an anonymized analysis of use behavior.

#### 4.4 Deactivating services and data exchange

Depending on the type of wireless network connection, the features of your vehicle, and the services that have been activated, the vehicle's exchange of data can be deactivated in whole or in part by

- a) removing the SIM card or disconnecting your end device, if the wireless network connection is established via an installed or pre-installed insertable SIM card or a Wi-Fi connection; or
- b) adjusting the settings accordingly in the options menu of your vehicle's PCM. Individual services may not function in full or at all if this is done.

By deactivating the PCM wireless module in the system settings, vehicle occupants can deactivate the data exchange performed by your vehicle's PCM via the wireless network connection.

By activating "private mode," vehicle occupants can deactivate the data exchange of the Connected Gateway and the associated processing of your personal data. This prevents the use of vehicle-related services and access to the vehicle and vehicle-related information (such as the vehicle's location, for example). Deactivation does not apply, in particular, to functions and services that are required by law, such as the traffic emergency call system "Emergency Call" and other emergency call systems.

To be able to provide these services in the individual case, it may be necessary, to the extent that your vehicle has these services, for the Connected Gateway to maintain a wireless network connection with wireless cells of the respective wireless network operator despite the activation of private mode (with regard to the exchange of data within the scope of connectivity, please see Sec. 4.1) and, in individual cases, to exchange data via the wireless network connection as specified in the relevant service description at [www.porsche.com/connect](http://www.porsche.com/connect). Services that cannot be deactivated are marked as such in the options menu under "private mode."

#### 4.5 Use of the online services by unregistered drivers

If other people use your vehicle [or] your vehicle's PCM, the data mentioned in Sec. 2 a) through h) hereof may be collected, processed, and used. To the extent that the other person does not have a Porsche ID user account of his/her own, this information will be collected and stored under your Porsche ID user account. In this case, it is not possible for us to identify this other driver, as we lack identification information.

#### 4.6 Online software update

If you have activated Online Software Updates in My Porsche, data may be exchanged between our systems and your vehicle for the purpose of updating the software of your vehicle systems and for troubleshooting software failures as part of service activities. For this purpose, your vehicle identification number, device identifications and their current software version, your Porsche ID and authorisation information are exchanged with our systems at regular intervals. In individual cases (e.g. update actions), information about the vehicle equipment as well as information

about the technical condition of your vehicle are transferred to our systems. You can terminate Online Software Update and the associated processing of personal data by deactivating the function in My Porsche.

#### 4.7. Product analysis, improvement and processing of swarm data

Depending on your vehicle's equipment, your vehicle may transfer infotainment system usage data, technical vehicle data and related environmental data, along with a temporary identification key, to our systems, providing you agree to transfer data as part of the vehicle installation in the PCM of your vehicle, or activate the function in the PCM of your vehicle. We use the data transferred for the purpose of analysing and improving our products and services.

Individual services, such as real-time traffic or safety radar, rely on providing information about, for example, the location, the environment and the movement of your vehicle, as well as data from other vehicles, in order to obtain new and more accurate information, such as current traffic and road conditions (swarm services). For this purpose, as part of vehicle use, the location, vehicle and environmental data and movement information from your vehicle may be transferred. We provide the aforementioned data to third parties in aggregated form only, and without reference to you or your vehicle.

The processing of this data for product analysis and improvement, as well as the processing of swarm data is based on our legitimate interest in the analysis and improvement of our products and services, as well as the provision of more precise content in the context of swarm services.

You can deactivate the transfer of data for these purposes at any time in the settings of the PCM of your vehicle under "Porsche Connect". Please note that this may limit the functionality of individual services when deactivated, in particular swarm services such as real-time traffic or safety radar. The exchange of data can also be prevented by setting "Privacy mode" into operation in accordance with paragraph 4.4.

### **5. Rights of data subjects**

As the subject of data processing, you have numerous rights. Please see Sec. 9 of the [General Data Protection and Privacy Statement for My Porsche and the Porsche Connect Store](#) for information on this.

### **6. Amendments to this data protection and privacy statement**

We reserve the right to amend this data protection and privacy statement. The current version of the data protection and privacy statement can always be accessed at <https://connect-store.porsche.com/gb/en/t/privacy>.

Last updated: 01.08.2018



## Porsche Smart Mobility Cookie Policy

### Scope

This cookie policy applies in addition to the general and specific Porsche Connect declaration of data protection and describes the nature, scope, purposes and legal basis, as well as the options for objecting to the processing of cookies. Additionally, the general and specific declaration of data protection for Porsche Connect, dated 25/05/18 applies to all other information.

### What are cookies?

To offer you a full range of functions when you visit our website, recognize your preferences, and make the use of our Web pages more comfortable and convenient, we use "cookies." Cookies are small files that are stored on your device using your Internet browser.

### Your options

By using our website, you agree to the use of cookies and to cookies being stored on your computer. You can also view our website without cookies, of course. If you do not wish cookies to be stored on your computer, you can deactivate the relevant option in your browser's system settings. You can delete stored cookies in your browser's system settings at any time. If you do not accept any cookies, however, this may restrict the functionality of our offerings.

### Categories of cookies

We use cookies for different purposes and with different functions. We distinguish in this regard according to whether the cookie is absolutely necessary in technical terms (technical necessity), how long it is stored and used (storage duration), and whether it has been stored by our website itself or by third parties, and which provider has placed the cookie on your computer (cookie provider).

#### Technical necessity

Cookies that are absolutely necessary in technical terms: We use certain cookies because they are absolutely necessary in order for the website and its functions to work properly. These cookies are automatically placed on your computer when you access the website or a certain function, unless you have set your browser to reject cookies.

Cookies that are not absolutely necessary in technical terms: By contrast, cookies that are not absolutely necessary are placed on your computer to do things like improve the convenience and performance of our website or save certain settings that you have made. We also use cookies that are not absolutely necessary in technical terms to determine information [on the] frequency of use of certain areas of our website so that we can gear it toward your needs and requirements on a more targeted basis in the future. We do not store any cookies that are not absolutely necessary in technical terms unless and until you have confirmed, by clicking the relevant field, that you have taken note of our cookie notice and will continue to use our website.

#### Storage duration

Session cookies: Most cookies are only needed for the duration of your current website and My Porsche visit or your session, and they are erased or become invalid as soon as you leave our website or your current session expires (termed "session cookies"). Session cookies are used, for example, to retain certain information, such as your Porsche login or shopping cart, during your session.

Permanent cookies: Only in isolated cases are cookies stored for a longer period. This is done, for example, to recognize you when you access our site again at a later time and to be able to access saved settings. This allows you to do things like access our pages faster or with greater convenience, or it eliminates the need for you to set certain options, such as your chosen language, over again. Permanent cookies are automatically deleted after a predefined

period when you visit the page or domain from which the cookie was placed on your computer.

Flow cookies: These cookies are used for communication among various internal Porsche servers. They are placed on your computer at the start of a user interaction and deleted after the end of the interaction. Flow cookies are given a unique identification number during the interaction, but this number does not permit any conclusions to be drawn regarding the actual customer or user.

#### Cookie providers

Provider cookies: Cookies are typically placed by the operator of our website, which is commissioned by us, itself when a person visits our website.

Third-party cookies: So-called "third-party cookies", on the other hand, are placed and used by other places or websites, for example, by providers of web analytics tools. For further information on Web analytics tools and measurement of reach, please see the rest of this cookie policy. External providers may also use cookies to display advertising or to integrate content from social networks, such as social plugins.

### Use of cookies for web analysis and range measurement

We use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses third-party cookies to identify the frequency of use of certain areas of our website and preferences. The information about your use of our web offer (including your shortened IP address) generated by the cookie is transferred to a server operated by Google in the USA and stored there. Google will use this information on our behalf and on the basis of a contract for processing to evaluate your use of our website, to compile reports on the activities of our website and to provide other services related to the use of the website and Internet usage. The legal basis for the use of Google Analytics is article 6 subparagraph 1. point (f). of GDPR; our legitimate interest arises in this respect for the purposes of the use described above, in particular in the analysis, optimisation and economic operation of our website.

### Deletion and opposition to the use of cookies

Acceptance of cookies when using our website is not mandatory; if you do not want cookies to be stored on your device, you can deactivate the corresponding option in the system settings of your browser. Saved cookies can be deleted at any time in the Internet options of your browser. If you choose not to accept any cookies, however, this can lead to restrictions in the functions offered on our website.

In addition, you can deactivate the use of Google Analytics cookies by means of a browser add-on if you do not want website analysis. You can download this here: <http://tools.google.com/dlpage/gaoptout?hl=de>.

Here, a so-called "opt-out" information is stored on your device, which serves to assign your deactivation of Google Analytics. Please note that such opt-out information will only disable Google Analytics for the device and the browser from which it was placed. You may also need to reset it if you delete cookies from your device. . As an alternative to the browser add-on, such as on mobile devices, you can also prevent collection by Google Analytics by clicking on the following <http://optout.networkadvertising.org/?c=1#!/> link. An "opt-out cookie" will be set to prevent the future collection of your data. The opt-out cookie is only valid for the browser used and only for our website offer, and is stored on your end device. If you delete cookies from the browser, you must set the opt-out cookie again.

You can also activate the "Do Not Track Function" on your end device. If this function is activated, your end device informs the respective service that they do not want to be tracked.

**Specifically, the following cookies may be stored when you visit our website:**

<b>Cookie name</b>	<b>Technically necessary?</b>	<b>Storage duration</b>	<b>Cookie provider</b>	<b>Purpose</b>
CIAM.s	Yes	Flow cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary in order to check whether the user's browser supports cookies.
CIAM.m	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary for user authentication.
CIAM.h	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary to store the user's session and login in My Porsche.
CIAM.status	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary to monitor the status of the user's session in My Porsche.
pcc.cookieAcceptance	Yes	Permanent cookie (storage duration: one year)	Dr. Ing. h.c. F. Porsche AG	This cookie stores the user's decision whether cookies can be stored in his/her browser on the browser side.
nonce.*	Yes	Flow cookie	Dr. Ing. h.c. F. Porsche AG	This cookie stores the user's decision whether cookies can be stored in his/her browser temporarily on the server side.
PF	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary for internal user authentication between different Porsche servers.
CIAM.pcc	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary to store the user session and login in My Porsche.
f5_cspm	Yes	Session cookie	Dr. Ing. h.c. F. Porsche AG	This cookie is necessary to redirect the user to a proxy server through the load balancer.
_utma	No	Permanent cookie (storage duration: two years)	Google	This cookie stores the number of visits by a user for Google Analytics.
_utmt	No	Session cookie	Google	This cookie stores the query type of the user's access for Google Analytics. A distinction is made between events, transactions, and items.
_utmb	No	Session cookie	Google	This cookie stores the duration of a user session for Google Analytics.
_utmz	No	Session cookie	Google	This cookie stores the referring page from which the user reached My Porsche for Google Analytics.
_utmv	No	Session cookie	Google	This cookie aggregates stored data for Google Analytics so that they can be displayed by Porsche AG in individual, anonymized reports.
NREUM	No	Session cookie, which is deleted on closing the browser.	New Relic Inc.	This cookie is only created in browsers that do not support the Navigation Timing API. If a browser supports the Navigation Timing API, a native interface may be used to determine the start time of navigation.

NRAGENT	No	Session cookie, which is deleted on closing the browser.	New Relic Inc.	This cookie is used to communicate between the end user metrics of the New Relic Collector and the agents running in its web application. A token identifies and correlates application-layer transaction tracks with corresponding browser tracks.
JSESSIONID	No	Session cookie, which is deleted on closing the browser.	New Relic Inc.	This cookie is used to store a session identifier so that New Relic can monitor the session count for an application. The cookie value is generated by Jetty.

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