

## **Legal notices on data protection**

### **MINI Connected**

Last updated: 2024.11

This policy contains details of the data processing that will take place for each MINI Connected service.

#### General information and data controllers

BMW Automotive (Ireland) Ltd, Swift Square, Santry Demesne, Dublin 9, D09 R802 (hereinafter referred to as "BMW").

Data processing takes place together with the national sales company BMW and Bayerische Motoren Werke Aktiengesellschaft, Petuelring 130, 80788 Munich, Germany, headquarters and court of registration: Munich HRB 42243 (hereinafter "BMW AG").

BMW provides to the customer certain vehicle-based information and assistance services (hereinafter "services") under the designation "MINI Connected" (hereinafter "MINI Connected Agreement") and is the contractual and operational point of contact for the customer.

BMW AG is responsible for technical provision of the services. Data is transmitted to BMW AG from BMW to provide the services and support for the customer.

#### How your personal information is collected

Data collected in the course of concluding an agreement or rendering services is processed for the purposes listed below:

#### **A. Conclusion of agreement**

As part of concluding the agreement, the categories of data listed below are processed:

Contact data (e.g. last name, first name, address, e-mail address)

Account data (e.g. MINI Connected)

#### BMW Group Login

To use the Service, you must register in the App / portal. When you register, you will receive an online customer account that gives you access to other BMW Group portals and offers. In order to provide you the BMW Group login service, your data is passed on to the BMW Group company that acts as a provider of the applications in use by you. Storage of the data from your customer account is handled by BMW AG and is separate from any other (even potentially identical) data about your person that may be available to BMW Group.

Your personal data is deleted automatically 6 years after the agreement expires.

#### **B. Fulfilment of the contractual obligation for performance of the MINI Connected Agreement**

For the purposes of fulfilling the MINI Connected Agreement concluded between you and BMW, BMW AG renders a variety of services, such as Intelligent eCall, information services, real-time traffic information, TeleServices, etc.

For performance of these services, the following information which may or may not be personal data (meaning information which is relating to an identified or identifiable natural person) and which originates from the vehicle is processed and possibly stored by BMW and commissioned service providers for such performance:

- Vehicle status information (e.g. mileage, battery voltage, door and hatch status.)
- Position and movement data (e.g. time, position, speed.)
- Vehicle service data (e.g. due date of next service visit, oil level, brake wear.)
- Dynamic traffic information (e.g. traffic jams, obstacles, signs, parking spaces.)
- Environmental information (e.g. temperature, rain.)
- User profile (e.g. configured news, e-mail or audio provider.)

A complete list and detailed description of the Services and the data used in each case can be found under the service description list.

The provision of this data is used for concluding the MINI Connected Agreement. Without your provision of such data and the processing of such data, BMW and BMW AG are, however, unable to provide the respective service for you.

The processed personal data is deleted automatically after 4 weeks if it is no longer needed for provision of the specific service.

### **C. Securing product quality and developing new products**

Beyond mere performance of Service, the data collected under section B. is also processed for quality assurance in products and services offered by BMW Group and for developing new products and services by BMW Group. This processing is used for the legitimate interests of BMW Group to meet the high customer standard placed on existing products and services and to allow the company to fulfil the future requests of its customers through new products and services that have not yet been developed. In order to protect the privacy of customers, data is processed solely in a manner that cannot be traced back to the customer/vehicle directly.

### **D. Fulfilment of the sales, service and administrative processes of BMW AG, the national sales company BMW and authorised dealers**

In order to optimise the customer experience and collaboration with BMW dealers continuously, BMW create evaluations and reports based on information from agreements and BMW share these evaluations and reports with the applicable BMW dealers. These evaluations are predominantly used for introducing appropriate measures (e.g. training courses for sales personnel) to improve the request and sales process. BMW will create the aforementioned reports only in an aggregated and anonymised form; this means that the recipients of the reports will be unable to draw any conclusions about you and your personal data.

Parts of the vehicle-specific data collected under B. are used for performance of the service processes (e.g. repair, warranty, goodwill) of BMW, BMW AG and BMW dealers. This processing is within the legitimate interests of BMW, BMW AG and BMW dealers to provide our customers with the best possible service process. Processing sometimes also takes place in connection with legal requirements (e.g. repair and maintenance information due to the provisions of anti-trust regulations). Technical data is always processed in relation to the vehicle and without direct connection to the customer in order to protect the privacy of our customers.

The following data categories are used for this:

- Vehicle master data (e.g. vehicle type, colour, equipment)
- Vehicle service data (e.g. due date of next service visit, oil level, brake wear)
- Vehicle status information (e.g. mileage, battery voltage, door and hatch status)

The technical vehicle data is deleted at the end of the vehicle life cycle.

BMW and BMW AG, process your data in order to make the administration of the various companies within BMW Group as efficient and successful as possible. One of the areas this affects is common group accounting in accordance with international accounting regulations for companies (such as the International Financial Reporting Standards (IFRS)).

### **E. Customer support**

BMW use your personal data for communication as part of concluding contracts, see above (e.g. booking MINI Digital services) or for the transaction of a request formulated by you (e.g. enquiries and complaints to BMW Customer Support). BMW may contact you regarding your contract or to process your request without your consent.

### **F. Marketing communications and market research due to consent**

Provided you have given your consent to any further use of your personal data, your personal data may be used and, to the extent necessary, passed on to third parties in accordance with the scope of the consent granted, for example,

for promotional purposes and/or market research. The details in this regard can be found on the respective consent form. Consent may be withdrawn at any time.

#### **G. Fulfilment of legal obligations**

BMW will also process personal data if it is necessary for compliance with a legal obligation or we have legitimate interest in processing personal data for the purpose of fulfilling legal requirements. This could be the case if we needed to contact you because your vehicle is subject to a recall or a Technical Campaign, for the purpose of money laundering checks when establishing a business relationship with you or to check relevant sanction lists or export control specifications that BMW Group must observe.

Collected data is also processed as part of safeguarding the operation of IT systems. Safeguarding in this context includes, but is not limited to, the following actions:

- Backup and restore of data processed in IT systems,
- Logging and monitoring transactions to check the specific functionality of IT systems,
- Detecting and protecting against unauthorized access to personal data to guarantee the integrity and security of IT systems,
- Incident and problem management for resolving faults in IT systems.

Collected data is also processed as part of internal compliance management at BMW Group, wherein we review aspects such as whether you have received adequate advice as part of concluding an agreement and whether the BMW Partner has complied with all legal requirements. We also have a legitimate interest in processing personal data to protect BMW Group's selective sales system, for example by identifying unauthorized resellers.

Within the framework of legal obligations, certain consumption data (known as OBFCM data, such as fuel consumption and mileage) is collected from your vehicle during workshop visits and directly transmitted to the EU Commission by the manufacturer (BMW AG). You can refuse to the collection and transmission of data for this purpose at authorized BMW workshops and BMW dealers.

BMW is subject to numerous additional legal obligations. In order to comply with these obligations, we process your data to the necessary extent and may potentially pass this data on to the responsible authorities upon their legitimate request or as part of legal reporting obligations. We may also process your data in the event of a legal dispute, providing the legal dispute requires the processing of your data.

#### **H. Data transfer to selected third parties**

Based on your consent, the data collected under B. can be passed on to a third party electronically via the CarData platform. Such transfer serves purposes in the relationship between you and the third party, such as concluding and fulfilling a usage-related insurance policy for your vehicle. As part of the CarData platform, basic information about the telematics capability of your vehicle may be provided to third parties in order to allow them to determine whether your vehicle comes into question for the use of CarData.

MINI provides the data collected under B. to third parties in anonymized form for the purposes of using resources such as mobility services, maps and tools, especially in combination with highly automated, fully automated and autonomous driving.

To fulfill contractual obligations and enable the service provision as well as the payment transaction, MINI passes data to third party providers.

#### **How long is your data stored?**

We save your personal data only for as long as the specific purpose it requires. If the data is processed for several purposes, the data is deleted automatically or saved in a form so that it cannot be traced back to you once the last specified purpose has been met.

### **How is your data stored?**

We store your data in accordance with the state of the art of technology. The following security measures serve as an example of the measures applied to protect your personal data from misuse or other unjustified processing:

- Availability of access to personal data is restricted to just a limited number of authorised persons for the specified purposes.
- Collected data is transferred only in encrypted form.
- Sensitive data is also saved only in encrypted form.
- IT systems for processing the data are compartmentalised from other systems, e.g. to prevent hacking.
- Access to these IT systems is monitored continuously in order to ward off and detect misuse early.

### **To whom is the data passed and how is it protected?**

Personal data is processed by BMW and BMW AG employees, BMW dealers and by service providers who have been commissioned, with preference given to those within the EU/EEA.

If data is processed in countries outside the EU/EEA, BMW AG uses EU standard agreements, including suitable technical and organizational measures, to ensure that your personal data is processed in accordance with the European level of data privacy. If you want to know more about the actual protections in place for data transfer to other countries, please contact us using the communications channels specified below.

The EU has already assessed that some countries outside of the EU, e.g. Canada and Switzerland have a comparable data privacy level. Due to the comparable data privacy level, data transfers to these countries do not require any additional safeguards, approvals or agreements.

### **How to change your privacy preferences**

You can change your preferences, or withdraw your consent in relation to how BMW uses your personal information in one of the following ways:

- You are also able to request information about your data stored at BMW as well as request the correction, deletion or restriction of your personal data for analytics and/or marketing use.
- By contacting the MINI Customer Services on 1890 719413
- Or by sending an email to [customerservicesie@mini.ie](mailto:customerservicesie@mini.ie)
- Or by writing to us at:

BMW Automotive (Ireland) Ltd  
Customer Services Manager  
Swift Square  
Santry Demesne  
Dublin 9  
D09 R802

\* Calls are free of charge plus your phone company's access charge.

Under certain conditions you have the right to require us to:

- Provide you with further detail on the use we make of your information
- Provide you with a copy of your information
- Update any inaccuracies in the information we hold about you
- Delete any information about you that we no longer have a lawful ground to use
- Remove you from any direct marketing lists when you object or withdraw your consent
- Provide you with your personal data in a usable electronic format and transmit it to a third party (right to data portability)
- Restrict our use of your personal data
- Cease carrying out certain processing activities based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and the rights of third parties.

If you are dissatisfied with our use of your information or our response to any exercise of these rights you have the right to complain to your data protection authority, this in Ireland is the Data Protection Commissioner.