

ZEEKR VEHICLE PRIVACY POLICY

Last updated: 16 October 2023

What does this policy cover?

This policy describes how ZEEKR EU B.V. (also referred to as "ZEEKR", "we" or "us") will make use of your data when you interact with us and the connected services provided by us in the ZEEKR vehicle ("Services").

It also describes your data protection rights, including the right to object to some of the processing which ZEEKR carries out. More information about the available Privacy Modes, your rights, and how to exercise them, is set out in the "Your choices and rights" section.

Please see the separate policies in relation to how we handle your Physiological Information (such as facial recognition data, voice recognition data) in our **Biometric Identification Privacy Policy** and our **Digital Assistance Privacy Policy**.

For more information about the services provided in the ZEEKR vehicle, please read the respective service description in our **Vehicle Terms of Use**.

Personal data we may collect about you

Where we refer to personal data below, we mean any information relating to an identified or identifiable living person.

Depending on the Services and Privacy Mode (please see more information below) selected by you, we may collect and process personal data about you for the legal bases and purposes set out below as follows:

Category	Data	Purpose and Legal basis	Categories of recipients of your personal data
User Information	Information including name, phone number, email address, address, country / region, privacy mode preference	To fulfil your request for products and services based on our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features
User Profile	Ambient lights, air conditioning, keyless unlock, including ergonomic settings (seats, mirrors, head-up screen)	To fulfil your request for products and services, and realize remote car control function based on our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features
Driving Service Information	Information indicating vehicle performance, including but not limited to vehicle speed, acceleration, driving duration, charging duration, battery information	To provide you with services (including checking the Driving Service Information on the ZEEKR APP and enabling the charging function), maintenance (remote vehicle diagnostics and support), and improve your vehicle performance over time	Our service providers enabling telematics and connected car features and charging service providers

		based on either – to the extent we expressly asked for it – your consent (Art. 6 (1) a) GDPR) or our contract with you (Art. 6 (1) b) GDPR)	
Vehicle Status Information	Information indicating vehicle status including vehicle diagnostics, battery information, vehicle software version and vehicle manufacturing date, vehicle identification number, configuration Logs for identifying and troubleshooting unexpected software or connectivity issues, and other debugging log reports	To provide you with services (including checking the vehicle status on the ZEEKR APP), maintenance (remote vehicle diagnostics and support), and improve your vehicle performance over time based on either – to the extent we expressly asked for it – your consent (Art. 6 (1) a) GDPR) or our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features
ZEEKR APP remote control	Your vehicle identification number, vehicle registration number, odometer information, SIM ID, GPS data, time and date, vehicle status information (including information on vehicle engine and gear status, battery, distance to empty information, smart key status information, lights, tire status information, heating, ventilation and air conditioning status information, brake and engine oil status)	To provide you with APP remote control services, and improve your vehicle performance over time based on either – to the extent we expressly asked for it – your consent (Art. 6 (1) a) GDPR) or our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features
Passenger Information	Information relating to passengers in the vehicle including if there is movement or belongings in the car	To provide you with Emergency call service based on our legitimate interests in ensuring the safety, security of the passengers (Art. 6 (1) f) GDPR)	Our service providers enabling telematics and connected car features and the emergency call feature and the public safety answering point (PSAP)
Virtual Identity and Authentication Information	Account number, digital certificate and related verification code, dynamic password, IP address	To provide you with account log-in service based on our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features

Geolocation Information	Vehicle movement track, precise navigation, car location etc.	To provide you with car locator, navigation services, maintenance (remote vehicle diagnostics and support), and improve the accuracy of the map over time based on either either – to the extent we expressly asked for it – your consent (Art. 6 (1) a) GDPR) or our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features, navigation and map services
Behaviour Information	Driving behavior (vehicle GPS position, acceleration, longitudinal acceleration, lateral steering wheel angle, speed odometer, road inclination, ambient temperature, accelerator pedal press, braking pedal press, posted speed limit (from the road sign camera), propulsion energy consumption, climate control energy consumption, auxiliary power consumption (remaining system), total vehicle energy consumption)	To provide driving coach service and to improve energy efficiency based on either either – to the extent we expressly asked for it – your consent (Art. 6 (1) a) GDPR) or our contract with you (Art. 6 (1) b) GDPR)	Our service providers enabling telematics and connected car features
Consent choices information	Consent choices	To maintain your consent record and to make sure you could exercise your data subject's right based on our legitimate interests in offering you a consent decision (Art. 6 (1) f) GDPR)	Our service providers enabling telematics and connected car features
Voice Recognition Information	Voice audio information, voice command information, GPS information (to enable navigation commands) and your contact list (for addresses and calling of contacts))	To provide you with voice recognition services, and improve the accuracy of the voice recognition services over time based on your consent (Art. 6 (1) a) and Art. 9(2) a) GDPR)	Our service providers enabling telematics and connected car features and voice recognition services
Repair and Maintenance Information	VIN, mileage, Vehicle fault information	To provide you with maintenance services (vehicle diagnostics and repair support) based on our contract with you (Art. 6 (1) b) GDPR)	Our group companies providing technical support and remote vehicle diagnostics services and our service providers enabling

			telematics and connected car features
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For Geolocation Information the third-party data recipients include:

- Here Europe B.V. for the Here Map service in context of navigation. You can find more information about how Here Global B.V. processes your personal data here: <https://legal.here.com/en-gb/privacy>
- Mobileye Vision Technologies Ltd. for the Mobileye services in context of map services. You can find more information about how Mobileye Vision Technologies Ltd. processes your personal data here: <https://www.mobileye.com/privacy-policy/>

There are instances where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain above what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals’ interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the policy.

Where we transfer your personal data

Based on Standard Contractual Clauses we share your Repair and Maintenance Information (VIN, mileage, Vehicle fault information) with our group companies in China, for them to provide technical support, maintenance and vehicle diagnostics services.

Based on the adequacy decision for Israel [_____ \(available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061) we share your Geolocation Information (including vehicle movement track, precise navigation, car location) with Mobileye Vision Technologies Ltd.

When we share your personal data with recipients in third countries not subject to an adequacy decision, we will safeguard the sharing of your personal data by using the Standard Contractual Clauses adopted by the European Commission, available at https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj.

Your choices and rights

Depending on the Services, there are three levels of Privacy Modes available:

1. Full privacy mode:
Almost all connected car features will be disabled, and your personal data will not be collected and sent except for features required by laws, in particular for the emergency call function.
2. Basic mode:
Only certain connected car features will be enabled, and the respective personal data will be collected and processed. This personal data includes vehicle identification

number, sensory and electronic information, vehicle status data, fault information, browsing information, user account information.

3. Advanced Mode:

All connected car features will be enabled, and the respective personal data will be collected and processed. This personal data includes vehicle identification number, sensory and electronic information, vehicle status data, fault information, browsing information, user account information, location information, video and audio recording.

For more detailed information about the enabled features and the respective personal data being collected and processed, please refer in your vehicle display interface to “CarSettings”-“Safety & Security”, where you will also be able to change the level of privacy mode and read detailed descriptions.

In addition, you have the following rights (see Art. 15 ff GDPR):

Right	Summary
The right to information	Enables you to receive information regarding whether we are processing your personal data
The right of access	Enables you to receive a copy of your personal data
The right to rectification	Enables you to correct any inaccurate or incomplete personal data we hold about you
The right to erasure	Enables you to ask us to delete your personal data in certain circumstances
The right to restrict processing	Enables you to ask us to halt the processing of your personal data in certain circumstances
The right to object	Enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party), including processing for direct marketing purposes - your objection will be upheld, and we will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims that may be brought by or against us.
The right to data portability	Enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

If you wish to exercise any of these rights, please contact us at the contact details set out below.

Wherever we rely on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. We may however have other legal grounds for processing your data for other purposes, such as those set out above.

In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

If you have unresolved concerns, you have the right to lodge a complaint to a data protection authority in the country that you reside in or, the country of your place of work or the country where

the alleged infringement took place. A list of data protection authorities in the EU/EEA is available at https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-is. For non-EU countries, please refer to the website of your local data protection authority.

Security

We protect your personal data from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and maintain the confidentiality of your personal data. This is also ensured using appropriate technical and organisational measures. We choose our security measures taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons and continuously improve them.

How long we retain your personal data

We only maintain the personal data we collect for as long as it is necessary for us to provide our services, for as long as it is required to fulfil the purposes of the processing of personal data, or as required by law.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data so that we can respect your request in future.

Updates to this privacy policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Contact us

The data controller for your personal data is ZEEKR EU B.V., corporate registration number 88529789, with address Jachthavenweg 112, 1081 KJ Amsterdam, the Netherlands.

If you have questions about this Privacy Policy or wish to contact us for any reason in relation to our personal data processing, please contact our data protection officer at dataprivacy@zeekr.eu.