# **Privacy Notice**

This Privacy Notice informs you how we use your personal data. Our goal is to help you understand what personal data we use, what we need your personal data for, what your rights are, and what we do to protect your privacy. To explain things as clearly as possible, we encourage you to carefully read the examples related to what you are interested in.

# Privacy in our digital products

We provide you with products and services in the digital environment. To make this Privacy Notice easier to understand, we will use the term "digital products" in this text for our following digital products and services:

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- your digital Škoda ID account<sup>1</sup>;
- mobile applications;
- internet portals, websites and webpages;
- vehicle infotainment system;
- and other services of this kind.

### +<sup>1</sup> What is Škoda ID?

Škoda ID is your account profile which you set up to use our digital products. We store your personal data in Škoda ID and our digital products access them whenever they are necessary to ensure full functionality of the digital products.

# Data used

#### What data do we use?

We use your personal data, so that you can enjoy full functionality of our digital products. We only use personal data which are necessary to do so. For all our digital products we need these personal data:

- identification data (e.g., name, surname, country, nationality, login, language);
- contact information (e.g., e-mail address, phone number);
- information on mutual communication and interaction (e.g., e-mail communication, chat conversations);
- descriptive data (e.g., preferred dealer);
- technical information (e.g., VIN number of your vehicle and registration plate number);
- localisations data;
- network identifiers.

If you want to use a specific digital product, we may require additional personal data from you so that you could use that digital product to its full extent. If you want to know more about how we

use your personal data in a specific digital product, you can learn more below in the section Specifics of particular digital products.

As we care about your privacy, at certain times we may specifically ask for your permission to access some of your data if you want to use a particular functionality of a digital product.

Also please stay assured that you can control what personal data we use by deciding which digital product you want to use. We inform you what personal data we need when you use a digital product for the first time.

# Data source

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#### Where do we get your data from?

We get your personal data directly from you. Primarily, we get your personal data from the following sources:

#### Data provided when registering in Škoda ID account

If you want to use any of our digital products, it is necessary to create your Škoda ID account. As a part of your registration, you fill in basic personal data in Škoda ID to provide you with a single sign-on solution to our digital products.

#### Data collected from website browsing and use of applications

If you use some of the digital products, we may use cookies or similar technology to collect data about you via the browser. For more information about our cookie policy, you can visit <u>Cookie</u> Settings<sup>2</sup>.

If you log into your Škoda ID and we have your consent, we will link this browsing history to your account to better tailor our offers to you.

Similarly, if you use any digital products in the form of a mobile app, we may need to use data which originated during your usage of the app, such as location or technical data.

If you want to know, what digital products use cookies, locations, please visit Specifics of particular digital products.

#### Data inserted into applications

In order to provide all functionalities of our digital products, we may also use data which you inserted into our applications, such as your preferred dealer.

#### Data collected from our mutual communication

When we communicate with you either directly or via a dealer, we may use your data which we obtained during our communication and interaction with you to assist you with the provision of our digital products.

#### Data collected from your vehicle

Personal data also originate when you drive your vehicle. For example, a functionality that creates a logbook of your travels may generate such data which originate when you drive Škoda vehicle. We may also use such data which originated when you were driving your vehicle to provide you with such a digital product.

### +<sup>2</sup> What are cookies?

Cookies are small blocks of data created by a web server (while you are browsing a website) and placed on your device, used to access a website (such as a computer or smartphone). If you use any of the digital products by using a web browser, we may also use the data about you collected via the browser (cookies). The cookie technology helps us, in particular, to enable some functionalities of the website, better understand your behaviour, analyse the effectiveness of advertisements, combat fraud, or fulfill other important roles. For example, we may use cookies to make the content and ads you see more relevant to you. However, we will only use cookies (other than strictly necessary cookies) if you give us consent to use your cookies via the cookie consent tool on our websites. For more information about our cookie policy, you can visit Cookie Settings.

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# The way we use your data

What do we need your data for?

We use your data, but only to the necessary extent for the following reasons:

#### **Provision of our digital products**

Our use of your data is necessary for the provision of our performance and keeping our promise when you agree to the terms and conditions of use of the digital products. If you want to use our digital products, we need to collect and use your data. Without using your personal data, we cannot ensure the full functionality of our digital products. Our use of your personal data is a contractual requirement, and therefore, if you do not give us your personal data, in many cases we might not be able to deliver our digital services or respond to your requests. Please be also aware that specific digital products may require specific personal data in order to be used.

#### Maintenance and support

It is also necessary for the performance of said contract to use your data in order to maintain our digital products and provide you with our support. We use your data to ensure our digital products

work as intended, to collect feedback and complaints and to bring you better versions of our current digital products. This includes primarily updating, troubleshooting, securing, and providing support to you. This ensures a full functionality of our digital products.

#### **Product improvement and development**

We use your data to analyse how you use our products and services where permitted by applicable law. Based on this information, we continually modify and improve our products and services to better serve you and respond to your needs. For example, we are able to develop and improve driver assistance functions (e.g., emergency braking, assisted parking and lane assist) and to develop and improve accident-related safety functions (e.g., programs to assess the severity of a potential collision, emergency call and other safety functions).

# **Company using data**

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#### Who does control how your data is used?

We control how your data is used. We are the company Škoda Auto a.s., with its registered seat at tř. Václava Klementa 869, Mladá Boleslav II, 293 01 Mladá Boleslav, Identification No.: 00177041, registered in the Commercial Register kept by the Municipal Court in Prague under Section B, File No. 332.

We are part of the Volkswagen Group.

# Sharing of your data

Who do we share your data with?

#### With your consent

We highly respect your personal data. Generally, we disclose your data when we have your consent.

Without your consent, we disclose your data to third parties only if it is necessary for the following reasons:

#### Your use of a third-party service

If you use our digital products in connection with a third party's service (for example, log-in via Facebook, financial services, or electric chargers), we will disclose your data only if this is

necessary for the use of the third party's service and the use of your data is therefore necessary to enable the functionality of the digital products. Do you want to know more<sup>3</sup>?

# + <sup>3</sup> Learn more

We may disclose your data to CARIAD SE, Berliner Ring 2, 38440 Wolfsburg, Germany and other relevant companies of the Volkswagen Group that host or develop some of the digital products. CARIAD SE may also help us evaluate data for statistical and analytical purposes. Furthermore, we may disclose your data to selected members of our distribution network which is essential to enjoy the full possibilities of our digital product, for example when you share with us who is your preferred dealer.

In addition, some of our digital products (or some of their functionalities) are provided to us by third parties, whom we need to share the necessary set of personal data with. Otherwise, you would not be able to use such functionalities. For example, we engage Cerence Inc., 15 Wayside Road, Burlington MA 01803, USA when providing "Online Voice Control" service which enables us to significantly increase the relevancy of navigation results.

We also engage providers of IT infrastructure and services such as Amazon Web Services, Inc., 410 Terry Av. North, Seattle WA 98109, USA, Microsoft Ireland Operations Limited, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland, and MongoDB Limited, Building 2 Number 1 Ballsbridge, Shelbourne Rd, Ballsbridge, Dublin 4, D04 Y3X9, Ireland.

#### To comply with legal requirements

Upon request, we may disclose your data to public authorities (courts, police, and other law enforcement agencies). We disclose your data only to the necessary extent and within the boundaries of the law.

### Transfer to third countries

In connection with the use of third party services, your personal data may be transferred to third countries, i.e. countries outside of the European Union ("EU") and European Economic Area ("EEA").

This only happens if you grant us your explicit consent or if we take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include:

- ensuring the non-EU or non-EEA countries to which transfers are made have been deemed adequately protective of your personal data for the purposes of data protection law by the relevant bodies; or
- imposing contractual obligations on the recipient of your personal data using provisions formally issued by the European Commission and available at <a href="https://eur-lex.europa.eu/eli">https://eur-lex.europa.eu/eli</a> /dec\_impl/2021/914. We use these provisions to ensure that your information is protected when transferring your personal data to third party providers outside the EU and EEA.

We will send your personal data to companies located in the United States of America ("USA") to servers located there. Such transfers are based on the adequacy decision for the USA which states that USA provides sufficient protection for personal data for companies that are certified under EU-US Data Privacy Framework.

# **Retention duration**

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#### For how long do we retain your data?

Generally, we will retain your data until the agreement on the provision of digital products between us is terminated and for the subsequent archiving period of 5 years after the termination of the agreement, after which we will delete all your personal data.

#### Automatic deletion after long-term inactivity

In case of your inactivity, we will notify you no later than 5 years after we became aware of your last activity. Then we may set your account as deactivated and archived. Unless you actively react to the notification, we will deactivate your account and archive it for a period of up to 5 years, after which we will delete all your personal data. We may delete your Škoda ID if you do not sign up for a digital product via this Škoda ID within 1 year after its creation.

We may also delete your Škoda ID created by a service partner if you do not complete the registration process within 1 year after its creation.

#### Your choice of deletion

We will also delete your personal data gathered and used by your Škoda ID upon your request, i.e., if you delete your Škoda ID through the Škoda ID profile portal.

However, we will retain some data for a longer period of time if it is necessary for our other legitimate legal or business purposes (such as for financial record-keeping or to finish open business transactions), until the relevant purpose will have been accomplished.

# Your rights

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#### What are your rights?

In connection with your personal data, you have the following rights:

#### + Access to your personal data

You have the right to know if we use your data. If you ask us, we will tell you if we use your data or not. If yes, you can also ask us to obtain information about our use of your data and obtain a copy of the data we use. You may also access such information via your Škoda ID account.

Upon your request, we will provide you with a response within 30 days. In case of more demanding requests, we are allowed to extend the period, but in any case, we will let you know.

#### + Withdraw your consent at any time

You have the right to withdraw consent where you have previously consented to the use of your data. The withdrawal of consent does not mean that the prior use of your data before the withdrawal is unlawful, but we will not use your data for the reasons for which you withdrew the consent anymore.

#### + Verify and seek rectification

You have the right to verify the accuracy of your data and ask us to update or correct the data we currently use.

#### + Have your personal data deleted

You have the right, in certain situations, to ask for the erasure of your data which we retain. This right applies for example, when you withdraw your consent or when the data is no longer necessary for the reason, for which we collected or used them. We strive to erase your data always when they are no longer needed. However, please bear in mind that there are situations, in which we are not able or allowed to delete your personal data.

#### + Restrict our use of your personal data

You have the right, in certain situations, to restrict our use of your data. This right applies for example, when you contest the accuracy of the data or when our use of your data is unlawful.

#### + Receive your personal data and have it transferred to another controller

You have the right to receive your data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.

#### **Right to object**

You have the right to object if you think that we should no longer process personal data. After your objection, we are obliged to demonstrate compelling legitimate grounds for the processing or stop the processing.

#### Right to no fully automated decision-making

Unless otherwise specified for a particular digital product we do not make any decisions based solely on automated processing<sup>4</sup>, including profiling<sup>5</sup>. On the contrary, we always involve human review when we make our decisions.

### + <sup>4</sup> What is automated processing?

Decision-making based solely on automated processing happens when significant decisions about you are taken by technological means and without any human involvement. They can be taken even without profiling.

# + <sup>5</sup> What is profiling?

Profiling means that your personal aspects are being evaluated in order to make predictions about you, even if no decision is taken. For example, if a company assesses your characteristics (such as your age, sex and height) or classifies you in a category, this means you are being profiled.

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# Contact

How can you exercise your rights?

If you have any questions about our use or protection of your data or if you want to exercise any of your rights, you can contact us:

#### **Electronically:**

https://www.skoda-auto.com/other/personal-data,

or via Škoda ID Portal at https://skodaid.vwgroup.io

#### By mail:

Škoda Auto a.s. tř. Václava Klementa 869 Mladá Boleslav II 293 01 Mladá Boleslav Czech Republic

We may charge a reasonable fee when your requests are apparently unfounded or excessive considering connected administrative costs.

#### **Data Protection Officer**

If you have a question about protection of your data, you can also directly contact our Data Protection Officer:

#### **Online:**

https://www.skoda-auto.com/other/personal-data

#### By e-mail:

#### dpo@skoda-auto.cz

#### Lodging a complaint

In case you disagree with our usage or protection of your data, you can lodge a complaint with the Data Protection Officer (DPO) of Škoda Auto or a supervisory authority:

#### By mail:

Office for Personal Data Protection Pplk. Sochora 27 170 00 Prague 7 Czech Republic

#### By phone:

+420 234 665 111

https://www.uoou.cz/en

# **Specifics of particular digital products**

Each of our digital products may need an additional set of your personal data to provide a full and quality experience. Also, some of our digital products may require sharing your data with a particular third-party provider of services. You can see all such differences below.

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#### Our digital products include in particular:

### Škoda Connect

Škoda Connect allows you to remotely monitor and control your connected vehicle and to access the safety and service functions of your vehicle via the mobile application. Do you want to know more<sup>6</sup>?

### +<sup>6</sup> Learn more

#### Škoda Connect needs your data so you could use the following functionalities:

- to get up-to-date traffic information;
- to use online voice control when searching for destinations in navigation or when dictating SMS messages;
- to search for points of interest in the proximity of your vehicle, such as petrol stations, charging stations for electric vehicles or parking spaces;
- to display the average speed, duration of the journey, distance travelled and average fuel consumption;
- to view the last known location of your vehicle;
- to get current vehicle alerts and/or any service needs and to administer them;
- to be contacted when your vehicle needs service (e.g. achieved service interval);
- to report a vehicle breakdown or accident;
- to establish a voice connection with the call centre operator;
- to get a message, if the vehicle leaves or enters a defined area;
- to remotely control the warning lights, and horn of the vehicle through the mobile application if you are within the sight range (approximately 500 meters) from the vehicle;
- to enable access to your vehicle for providers of services that will need such access (e.g., for delivery of parcels); or
- an automatic or a manual emergency call if your vehicle is involved in a traffic accident or any other incident potentially threatening your life or health.

#### Data used

In order to provide you with these functionalities, we may need to use also the following personal data:

- additional identification data (e.g., title, date and place of birth, driving license number);
- network identifiers (e.g., IP address and cookies);
- trading history (e.g., transactions and contracts, including related information);
- technical information on the product: technical description of the asset (e.g., vehicle model and colour);
- localisation data<sup>6.1</sup> based on GPS or derived from other technology;
- transaction data (e.g., bank account number);
- audio-visual records<sup>6.2</sup> (e.g., voice recordings).

#### Sharing of your data

In order to provide you with digital product Škoda Connect, we may disclose your data also to the following third parties:

- providers of Škoda Connect services;
- delivery provider or other service providers that will need access to your vehicle that you approved in advance (e.g., for delivery of parcels);
- emergency service constituents when you make an emergency call.

In case of delivery of a parcel directly to your vehicle or provision of a service that requires access to your vehicle, the selected service provider will locate your parked vehicle, unlock it, provide the service, lock your vehicle and check the lock. Your selected service provider will receive your name and surname, e-mail address, phone number and the model and colour of your vehicle. Your selected service provider will receive the location of your vehicle and the possibility to unlock and lock your vehicle only for the time necessary for the delivery of the particular parcel or providing the ordered service. You can also deactivate the service for selected partners or single delivery or service directly in the mobile application.

While purchasing the goods or ordering a service, you give consent to your selected partner to access your vehicle. The access to your vehicle is secured by hashed information (purchase order number, designated time slot for delivery and other information) and time code (based on the configurable time slot for a delivery). There is a limit for single successful attempts to access your vehicle.

### + <sup>6.1</sup> Why do we need these data?

We need your localization data to ensure full functionality of the following Škoda Connect functionalities:

- to get current weather information for the current location and destination;
- to get up-to-date traffic information;
- to enable the selected service provider to locate your parked vehicle and deliver the parcel directly to your vehicle or provide other ordered service that requires access to your vehicle;

- to improve the quality of data about the charging infrastructure (e.g. location, charging speed) within the map data that will help to to improve the planning of charging stops when navigating or a better results in while searching for a charging station; or
- an automatic emergency call or to make a manual emergency call if your vehicle is involved in a traffic accident or any other incident potentially threatening your life or health.

### + $^{6.2}$ Why do we need these data?

We need your voice recordings to ensure full functionality of Online voice control when you search for destinations in navigation or when you dictate SMS messages.

### Škoda Connect LITE Services

Through connection with your vehicle using DataPlug module, the Škoda Connect LITE app allows you to profit from smart car functions. It allows you to analyse your driving patterns, increase your driving efficiency, control the technical state of your vehicle as well as it provides many other functions. Do you want to know more<sup>7</sup>?

# +<sup>7</sup> Learn more

#### Škoda Connect LITE needs your data so you could use the following functionalities:

- to display the average speed, duration of the journey, distance travelled and average fuel consumption;
- to view the last known location of your vehicle;
- to get current vehicle alerts and/or any service needs and to administer them;
- to be contacted when your vehicle needs service (e.g. achieved service interval);
- to report a vehicle breakdown;
- to establish a voice connection with the call centre operator;
- to allow service appointment requests and optimise the workload of Škoda service partners;
- to provide you support and bug fix the Škoda Connect LITE app.

However, if you are not logged in to the Škoda Connect LITE app, we do not process your personal data and they will only be stored locally on your mobile device until you uninstall the app. Please note that some of Škoda Connect LITE services require login with your Škoda ID.

#### Data used

In order to provide you with our Škoda Connect LITE services, we may need to use also the following personal data:

- localisation data<sup>7.1</sup> based on location of your mobile device;
- network identifiers<sup>7.2</sup> (e.g., IP address and cookies);
- technical information on the product<sup>7.3</sup> (e.g., mileage, maintenance interval);

### + <sup>7.1</sup> Why do we need these data?

To use services within the Škoda Connect LITE app such as Trips, Challenges, Assistance Call, Service Partners, Fuel Monitor and Parking Space, the transmission of localization data may be required. Localization data will be transmitted only if this feature has been activated in the Škoda Connect LITE app by your active permission.

### + <sup>7.2</sup> Why do we need these data?

Based on your consent, we may process your personal data for the purpose of optimisation of Škoda Connect LITE services experience using the Adobe Analytics web analysis service and web analytics service "adjust" by adjust GmbH ("adjust"), which helps us analyse your access to Škoda Connect LITE app. For this evaluation, cookies are stored on your mobile device. These are used to collect information.

Direct personal reference to the information stored on the Adobe servers is excluded as Adobe Analytics uses anonymized IP address.

You may revoke your consent to data collection and processing altogether with cookies being used with effect for the future by deactivating tracking by Adobe under "Settings", at any time. It is not possible to delete individual cookies.

You may refuse such data collection and processing at any time with effect for the future by deactivating tracking by "adjust" by turning off the sliding button in the settings under "Analytics".

Complete deletion of cookies is guaranteed only by uninstalling the Škoda Connect LITE app.

### + <sup>7.3</sup> Why do we need these data?

To use the "Service appointment request" service technical information on the product is processed to inform Škoda service partner about the vehicle status.

#### Sharing of your data

To be able to provide you with a requested service we may transfer your personal data to the following categories of recipients:

- provider(s) of maps,
- provider(s) of assistance,
- IT administrator(s),
- provider(s) of market analysis, in particular Adobe Systems Software Ireland Limited ("Adobe"), whose servers store data collected via cookies. It is not possible to rule out access to this information by Adobe Systems Incorporated, having headquarters in the USA,

 provider of web analytics service, "adjust", whose servers store data collected and its subprocessors.

Personal data will be shared with third parties if this is necessary for the purpose of performing a contractual obligation, in particular for the provision of services (e.g. displaying vehicle location using Google Maps service of Google Inc.).

#### Car Configurator on Škoda Auto website

Car Configurator is a web-based platform for the configuration of vehicles that enables you to configure your own vehicle in a few simple steps by selecting features of your wished vehicle. Do you want to know more<sup>8</sup>?

## +<sup>8</sup> Learn more

#### Saving of your vehicle configuration

If you log in to your account, we will save your vehicle configuration and send it to you via e-mail.

#### Sharing of your data

In order to provide you with a Car Configurator product, we may disclose your data also to a provider of financial services.

#### **Powerpass**

With Powerpass, you can subscribe and manage Powerpass tariffs, control invoicing, payment methods as well as pair and manage your wallbox. You can also access charging statistics and the charging history, manage and remotely control charging sessions for your vehicle and run RFID charging cards. Do you want to know more<sup>9</sup>?

### +<sup>9</sup> Learn more

#### Data used

In order to provide you with our Powerpass service, we may need to use also the following personal data:

- technical information on the product: information of the charging history (e.g. charging volume, duration or time, start and end of charging session, optional feedback supplied as part of a charging session), RFID card number of any charging card used for the charging session ; and
- localisation data: location of the vehicle while charging (charge point address).

#### Sharing of your data

Please note that charging contract including charging plan is provided by Volkswagen Group Charging GmbH, Germany, and Volkswagen Group Charging CZ s.r.o., Czech Republic (within the Czech Republic) ("Elli") under joint responsibility. More information on the processing of your personal data by Elli can be found in Elli's privacy policy at https://www.elli.eco/en/privacy.

We also engage Elli as data processor to help us evaluate data for statistical and analytical purposes to improve offers and products, to ensure and improve product quality and to research and develop new products or services. In addition, the analyses are used to improve and ensure customer care, to identify and solve bugs or similar technical problems and for business planning, business mining, internal reporting and forecasting.

#### **Digital manual**

You can find the "Digital Manual" in the mobile application. In some vehicles it is also available directly in the vehicle infotainment. We store information about whether you have downloaded the current version of the digital manual that is available to you. Do you want to know more<sup>10</sup>?

### + <sup>10</sup> Learn more

#### Data used

In order to provide you with our Digital manual service, we may need to use also the following personal data:

- technical information on the product: information on the manner of using the asset (e.g., vehicle); and
- information on internal control and investigation: logs.

# **Other information**

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#### Archiving in the public interest

We may archive your data in the public interest and use them for scientific, historical, or statistical research purposes. In well-founded cases, your data can also be used for the reason of legal matters resolution, including the performance of our obligations towards public administration bodies and monitoring and ongoing evaluation of legal risks.

You must be at least 16 years old to be able to use our digital products. Only by determining the minimum age we may become assured that our digital products are only used by persons for whom they are intended. We also provide special protection of individuals under 16 by prohibiting general access to all connected services.