

# **General Toyota Privacy and Data Protection Policy**

**Toyota Motor Europe NV/SA (“TME”)**

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**Tweddle Litho of Europe BVBA**

## 1. INTRODUCTION

Toyota respects your privacy. Whether you deal with Toyota as a customer, a consumer, a member of the general public, etc., you are entitled to the protection of your Personal Data. This data may relate to your name, telephone number, email address but also to other data, such as your Vehicle Identification Number (VIN), (geo-)location, etc.

In this **General Toyota Privacy and Data Protection Policy** (“**this Policy**”) we describe how we collect your Personal Data and why we collect it, what we do with your Personal Data, with whom we share it, how we protect it, and the choices you can make about your Personal Data.

This Policy applies to the processing of your Personal Data in the framework of various services, tools, applications, websites, portals, (online) sales promotions, marketing actions, sponsored social media platforms, etc. that are provided or operated by us or on our behalf.

This Policy contains general rules and explanations. It is complemented with separate specific privacy notices relating to particular services, tools, applications, websites, portals, (online) sales promotions, marketing actions, sponsored social media platforms, etc. provided or operated by or on behalf of Toyota. These privacy notices will be communicated to you whenever your Personal Data is needed in the framework of the activities mentioned above (for example, via websites, portals, individual communication services, newsletters, reminders, surveys, offers, events, etc.).

This Policy applies to all your Personal Data collected and used by (or on behalf of) Toyota Motor Europe NV/SA and/or Tweddle Litho of Europe, together referred to in this Policy as “**Toyota**”, “**we**”, “**us**” and “**our**”.

If you accept the provisions of this Policy by checking the checkbox “ I have read and agree to the Toyota/Lexus TechDoc Privacy Declaration”, you are agreeing to us processing your Personal Data in the ways that are set out in this Policy.

At the end of this Policy, you will find some definitions of certain key concepts used in this Policy and which are capitalised (for example, Personal Data, Processing, Data Controller...).

## 2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

**Toyota Motor Europe NV/SA (“TME”)**  
Avenue du Bourget/Bourgetlaan 60  
1140 Brussels  
Belgium

## 3. WHO CAN YOU CONTACT IN CASE YOU HAVE QUESTIONS OR REQUESTS? THE DATA PROTECTION CONTACT POINT

We have organised a Data Protection Contact Point which will handle your questions or requests relating to this Policy, any specific privacy notice, your Personal Data (and its Processing).

For any questions or requests or complaints concerning the application of this Policy or to exercise your rights, as described in this Policy, you may contact us at the Data Protection Contact Point:

- [map-updates@tweddle.com](mailto:map-updates@tweddle.com) and
- **Tweddle Litho of Europe BVBA**  
Brandekensweg 2  
2627 Schelle  
Belgium

#### 4. KEY PRINCIPLES

We value your Personal Data entrusted to us and we are committed to processing your Personal Data in a fair, transparent and secure way. The key principles Toyota applies are as follows:

- **Lawfulness:** we will only collect your Personal Data in a fair, lawful and transparent manner.
- **Data minimisation:** we will limit the collection of your Personal Data to what is directly relevant and necessary for the purposes for which they have been collected.
- **Purpose limitation:** we will only collect your Personal Data for specified, explicit and legitimate purposes and not process your Personal Data further in a way incompatible with those purposes.
- **Accuracy:** we will keep your Personal Data accurate and up to date.
- **Data security and protection:** we will implement technical and organisational measures to ensure an appropriate level of data security and protection considering, among others, the nature of your Personal Data to be protected. Such measures provide for the prevention of any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and any other unlawful form of Processing.
- **Access and rectification:** we will process your Personal Data in line with your legal rights.
- **Retention limitation:** we will retain your Personal Data in a manner consistent with the applicable data protection laws and regulations and no longer than is necessary for the purposes for which they have been collected.
- **Protection for international transfers:** we will ensure that any of your Personal Data transferred outside the EEA is adequately protected.
- **Safeguards towards third parties:** we will ensure that Personal Data access by (and transfers to) third parties are carried out in accordance with applicable law and with suitable contractual safeguards.
- **Lawfulness of direct marketing and cookies:** when we send you promotional materials or place cookies on your computer, we will ensure that we do so in accordance with applicable law.

#### 5. PROCESSING OF YOUR PERSONAL DATA: WHICH PERSONAL DATA DO WE COLLECT AND ON WHICH LEGAL GROUNDS

Whenever we require your Personal Data, we will always clearly inform you which of your Personal Data we collect. This information will be provided to you through a separate privacy notice which will, for example, be included in specific services (including communication services), electronic newsletters, reminders, surveys, offers, invitations for events, etc.

Please note that in accordance with applicable data protection law, your Personal Data can be processed if:

- you have given us your consent for the purposes of the Processing (as described in the privacy notice related to that particular Processing). For the avoidance of doubt, you will always have the right to withdraw your consent at any time; or
- it is necessary for the performance of a contract to which you are a party; or

- with such Processing, we pursue a legitimate interest that is not outbalanced by your privacy rights. Such legitimate interest will be duly communicated to you in the privacy notice related to that particular Processing.
- it is required by law.

## **6. FOR WHICH PURPOSES WE PROCESS YOUR PERSONAL DATA**

We will only process your Personal Data for specified, explicit and legitimate purposes and we will not process your Personal Data further in a way that is incompatible with those purposes.

Such purpose can be the execution of an order you have placed, the improvement of your visit on one of our websites or portals, the improvement of our products and services more generally, the offering of services or applications, marketing actions, etc. The purpose of each Processing of your Personal Data will be clearly defined in the specific privacy notice relating to that particular Processing. This privacy notice will be accessible, for example, on a website or portal, on an application, in an electronic newsletter, etc.).

## **7. KEEPING YOUR PERSONAL DATA ACCURATE AND UP-TO-DATE**

It is important for us to maintain accurate and up-to-date records of your Personal Data. Please inform us of any changes to or errors in your Personal Data as soon as possible by contacting us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”). We will take reasonable steps to make sure that any inaccurate or outdated Personal Data is deleted or adjusted accordingly.

## **8. ACCESS TO YOUR PERSONAL DATA**

You have the right to access your Personal Data which we are processing and, if your Personal Data is inaccurate or incomplete, to request the rectification or erasure of your Personal Data. If you require further information in relation to your privacy rights or would like to exercise any of these rights, please contact us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”).

## **9. HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We will keep your Personal Data in a manner consistent with applicable data protection law. We will only keep your Personal Data for as long as necessary for the purposes for which we process your Personal Data or to comply with the law or. For information on how long certain Personal Data is likely to be kept before being removed from our systems and databases, please contact us at the Data Protection Contact Point (see section 3 “Who can you contact in case you have questions or requests?”).

## **10. PROTECTING YOUR PERSONAL DATA**

We have a set of technical and organisational security measures in place to protect your Personal Data against unlawful or unauthorised access or use, as well as against accidental loss or damage to their integrity. They

have been designed taking into account our IT infrastructure, the potential impact on your privacy and the costs involved and in accordance with current industry standards and practice.

Your Personal Data will only be processed by a third party Data Processor if that Data Processor agrees to comply with those technical and organisational data security measures.

Maintaining data security means protecting the confidentiality, integrity and availability of your Personal Data:

- (a) **Confidentiality:** we will protect your Personal Data from unwanted disclosure to third parties.
- (b) **Integrity:** we will protect your Personal Data from being modified by unauthorised third parties.
- (c) **Availability:** we will ensure that authorized parties are able to access your Personal Data when needed.

Our data security procedures include: access security, backup systems, monitoring, review and maintenance, management of security incidents and continuity, etc.

## 11. USE OF COOKIES OR SIMILAR DEVICES

We use cookies on our websites. This helps us to provide you with a better experience when you browse our website and also allows us to make improvements to our site.

## 12. DISCLOSURE OF PERSONAL DATA

Depending on the purposes for which we collect your Personal Data, we may disclose it to the following categories of recipients:

- a) **Within our organisations and our brand environment:**
  - Our authorised staff members;
  - Our affiliates and subsidiary companies;
  - **Members of our Authorised Retailer and Repairer network** which you have been in contact with;
- b) **Third party business partners:**
  - **Advertising, marketing and promotional agencies:** to help us deliver and analyse the effectiveness of our advertising campaigns and promotions;
  - **Business partners:** for example, trusted companies that may use your Personal Data to provide you with the services and/or the products you requested and/or that may provide you with marketing materials (provided that you have consented to receiving such marketing materials). We ask such companies to always act in compliance with applicable laws and this Policy and to pay high attention to the confidentiality of your personal information;
  - **Service providers of Toyota:** companies that provide services for or on behalf of Toyota, for the purposes of providing such services (for example, Toyota may share your Personal Data with external providers of IT related services);
- c) **Other third parties:**

- **when required by law or as lawfully necessary to protect Toyota:**
  - to comply with the law, requests from authorities, court orders, legal procedures, obligations related to the reporting and filing of information with authorities, etc.;
  - to verify or enforce compliance with Toyota’s policies and agreements; and
  - to protect the rights, property or safety of Toyota and/or its customers;
- **in connection with corporate transactions:** in the context of a transfer or divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of Toyota’s business.

Please be aware that third party recipients listed under points b) and c) above –especially service providers who may offer products and services to you through Toyota services or applications or via their own channels– may separately collect Personal Data from you. In such case, these third parties are solely responsible for the control of such Personal Data and your dealings with them will fall under their terms and conditions.

### **13. SPECIFIC CONTACT WITH OUR AUTHORISED RETAILERS AND REPAIRERS**

If you purchase a car or another product or service from one of our Authorised Retailers or Authorised Repairers or if you give them your personal information, you will have a separate relationship with this Authorised Retailer or Authorised Repairer. In this case, they become the data controller of your Personal Data, possibly together with us. For all questions or requests about the collection and use of your Personal Data by one of the Authorised Retailers or Authorised Repairers, please contact them directly.

### **14. USE OF SOCIAL MEDIA**

If you use on a Toyota tool (website, portal...) a specific login from a social media (for example, your Facebook account), Toyota will record your Personal Data available on this social media and your use of such social media means that you have explicitly allowed the communication of your Personal Data recorded by Toyota through its tool.

Toyota sometimes facilitates the publication of (personal) data via social media such as Twitter and Facebook. These social media have their own terms of use which you need to take into account when active on social media. We remind you that publication on social media may have certain consequences, including for your privacy or for the privacy of persons whose Personal Data you share, such as, for example, the impossibility to withdraw a publication within a short term. You are fully responsible for your publications. Toyota will not have any responsibility and liability in this regard.

### **15. TRANSFERS OUTSIDE THE EEA**

Your Personal Data may be transferred to recipients which may be outside the EEA, and may be processed by us and these recipients outside the EEA. In connection with any transfer of your Personal Data to countries outside the EEA that do not generally offer the same level of data protection as in the EEA, Toyota will implement appropriate specific measures to ensure an adequate level of protection of your Personal Data. These measures can for instance consist in agreeing with recipients on binding contractual clauses guaranteeing such adequate level of protection.

We will always clearly inform you whenever your Personal Data would be transferred outside the EEA. This information will be provided to you through a separate privacy notice which will, for example, be included in specific services (including communication services), electronic newsletters, reminders, surveys, offers, invitations for events, etc.

## 16. YOUR CHOICES AND YOUR RIGHTS

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your Personal Data.

- *Your choices on how you want to be contacted*

In this context, you can make a variety of choices about how you want to be contacted by us, through which channel (for example, email, mail, social media, phone...), for which purpose and how frequently, by adjusting the privacy setting on the relevant device or updating your user or account profile or by following the unsubscribe instructions included in the communication.

Please note that by default, if you don't make a choice, you will receive our promotional communications at the normal frequency of the publication involved.

- *Your Personal Data*

You may always contact us at the Data Protection Contact Point (see section 3 "Who can you contact in case you have questions or requests?") to find out what Personal Data we have concerning you and its origin. Under certain conditions, you have the right to receive your Personal Data, which you have provided to us, in a commonly used, structured machine readable format and to transmit your Personal Data to any third party of your choice.

- *Your corrections*

If you find any mistake in your Personal Data or if you find it incomplete or incorrect, you may also require from us that we correct or complete it.

- *Your restrictions*

You have the right to request a restriction on the Processing of your Personal Data (for example, while the accuracy of your Personal Data is being checked).

- *Your objections*

You may also object to the use of your Personal Data for direct marketing purpose (if you prefer, you can also indicate to us through which channel and how frequently you prefer to be contacted by us) or to the sharing of your Personal Data with third party for the same purpose.

You may withdraw your consent at any time to the continued Processing of the Personal Data that you have provided to us by contacting us at the Data Protection Contact Point (see section 3 "Who can you contact in case you have questions or requests?").

Moreover, you may require us to erase any data concerning you (except in some cases, for example, to prove a transaction or when required by law).

Finally, please note that you have the right to file a complaint against the Data Controller with the relevant data protection authority ("DPA").

With respect to TME (as Data Controller), the relevant DPA is the Belgian Data Protection Authority. With respect to Tweddle Litho of Europe (as Data Controller), the relevant DPA is the Belgian Data Protection Authority.

## 17. LEGAL INFORMATION

The requirements of this Policy supplement, and do not replace, any other requirements existing under applicable data protection law. In case of contradiction between what is written in this Policy and requirements in applicable data protection law, applicable data protection law will have priority.

Toyota may amend this Policy at any point in time. Where this happens we will alert you of any changes and we will then ask you to re-read the most recent version of our Policy and to confirm your acceptance thereof.

## 18. DEFINITIONS

In this Policy, the following terms have the following meanings:

- (a) **Data Controller** means the organisation which determines the purposes for which, and the manner in which, your Personal Data is processed.  
Unless we inform you otherwise, the Data Controller is Toyota Motor Europe NV/SA (Avenue du Bourget 60, 1140 Brussels, Belgium). Further information may be provided to you through a separate privacy notice which will, for example, be included in specific services (including communication services), electronic newsletters, reminders, surveys, offers, invitations for events, etc.
- (b) **Data Processor** means the person or organisation which processes your Personal Data on behalf of the Data Controller. Unless we inform you otherwise, the Data Processor is Tweddle Litho of Europe (Brandekensweg 2, 2627 Schelle, Belgium).
- (c) **Data Protection Contact Point** means the contact point (i.e. a person appointed by Toyota in the relevant jurisdiction) where you can address to the Data Controller your questions or requests regarding this Policy and/or (the Processing of) your Personal Data and which will handle such questions and requests.
- (d) **EEA** means the European Economic Area (= member states of the European Union + Iceland, Norway, and Liechtenstein).
- (e) **Personal Data** is any data relating to you directly or which allows your identification, such as, for example, your name, telephone number, email address, Vehicle Identification Number (VIN), (geo-)location, etc.
- (f) **Processing** means the collection, accessing and all forms of use of your Personal Data.

<b>I HAVE READ AND ACCEPTED THE PROVISIONS OF THIS POLICY</b>
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