

# Information on the protection of your personal data

## INTRODUCTION

### SECTION A. Things to know before reading this data protection policy (hereinafter the "Policy")

#### **A.1. Why does this Policy use capitalized terms?**

Capitalized terms are defined in section 8 below (see section 8 - USEFUL DEFINITIONS).

#### **A.2. Who is this Policy for?**

This Policy is intended for customers (hereinafter referred to as "you" and its derivatives like "your(s)") whose personal data is processed by Renault SAS, the parent company of Renault Group (hereinafter referred to as "Personal Data").

A "customer" for the purposes of this Policy includes:

- (i) the natural person who contacts us in order to obtain information about the products and services we offer and/or a person who has had interactions with us to express an interest in Renault Group' products and/or services, and who have agreed to be contacted for this purpose by Renault.
- (ii) a non-professional customer who has purchased for private use through the Renault Distribution Network a vehicle of Renault Group' brands, such as Renault, Dacia, Alpine and Mobilize (hereinafter the "Vehicle").
- (iii) the non-professional customer who has purchased through the Renault Distribution Network products (e.g. accessories, etc.) and/or services, including those associated with a Vehicle (e.g., Connected Services, etc.).

In addition, please note that the Products and Services we offer are mainly aimed at adults and possibly minors represented by their legal representatives, but as our products and services are not specifically intended for them, the processing of their personal data is occasional.

#### **A.3. What kind of activities are covered by this Policy?**

To meet the needs of its customers throughout their lives as motorists, Renault has evolved its activity from a primary manufacturer of Vehicles to that of a supplier of services, including those associated with Vehicles.

Renault's activities that may give rise to the processing of personal data described in this Policy are as follows:

- The sale of services, including those associated with the Vehicles (e.g. Connected Services allowing a better driving experience, etc.), hereinafter referred to as the "Services".
- Your account management, enabling them to take full advantage of the connected services associated with their vehicle (MY Renault, MY Dacia, MY Alpine, etc...)
- Your interaction with our websites.

#### **A.4. What do we mean by the term " Renault Group "?**

The Renault Group is composed by legal entities, its subsidiaries, operating in France and/or abroad, having each a specific scope of activity, for example i) organizing the distribution of Vehicles, Services and providing mobility services in each of the countries where the Renault Group operates (hereinafter "**Renault Commercial Subsidiaries**"), ii) supply under the brand name "Mobilize Financial Services" financial products (e.g. credit, long-term leasing, leasing with an option to purchase, insurance offers, etc.) ( designated hereinafter "**Renault Financial Subsidiary**") and iii) operate as car manufacturer and define the strategy for the Vehicles and/or Services distribution.

These last activities are specifically operated by Renault SAS parent company of the Renault Group, hereinafter "Renault"), located in France, at 122,122 bis avenue du Général LECLERC - 92100 Boulogne-Billancourt CEDEX.

## **A.5. How does Renault organize its Vehicles and/or Services distribution?**

To organize the Vehicle and/or Services distribution withing different geographical territories, Renault relies on:

- The **Renault Commercial Subsidiaries**. Renault Commercial Subsidiaries are respectively contractually linked through a partnership contract (or, as the case may be, an agent or authorized repairer contract) to its Primary Network, which ensures territorial coverage by setting up physical establishments such as dealerships, agencies or garages (to find out more, consult <https://www.renaultgroup.com/en/directory/>). The Secondary Network is made up of companies that are independent of the Renault Group, and are contractually attached to the Primary Network, usually through an agent, distribution, or authorized repairer contract. The Primary and Secondary Networks together constitute the Renault Group's approved network (hereinafter referred to as the "**Renault Commercial Network**").

- The **Independent Commercial Network**, composed of legal entities which do not belong to the Renault Group (an asterisk designates them among the list available <https://www.renaultgroup.com/en/directory/>), but with which we concluded exclusive distribution agreements regarding Renault's Vehicles and/or Services (such as the repair, the maintenance services and the safety) within their geographical area of competence.

This is why, depending on the country where you are located, you can purchase our Vehicles and/or Services from either from the Renault Commercial Network or the Independent Commercial Network, which are together referred in this Policy as the "**Renault Distribution Network**".

## **SECTION B. What is the purpose and scope of this Policy?**

### ***B.1. The purpose of this Policy***

The purpose of this Policy is to enable our customers to become aware in a clear, concise, and accessible manner of the use of their personal data, our commitments and measures that we put in place to guarantee the protection of their personal data, the rights they have and the methods of exercising them.

To find out more about Renault Group's commitment to complying with the regulations applicable to personal data, thank you for consulting <https://www.renaultgroup.com/en/our-commitments/the-groupe-renault-and-your-personal-data/>.

This Policy may, if necessary, be supplemented in particular by other information notices.

### ***B.2. To what processing does this Policy apply?***

#### ***Processing covered by this Policy***

In the context of this Policy, we will describe the processing of personal data carried out by Renault, the parent company of Renault Group, hereinafter referred to as "we", "us" and its derivatives ("our(s)"):

- as an independent data controller when processing customer personal data
- and/or joint data controller with partners, Third Parties to the Renault Group.

#### ***Processing not covered by this Policy***

However, this Policy does not apply to the processing:

- carried out by Renault in respect of the data of customers who have purchased the Vehicles for resale for commercial activity,
- carried out by Renault in respect of candidates for recruitment (the policy of the Renault is accessible here, <https://www.renaultgroup.com/talent-your-personal-data/>,
- carried out by Renault with regard to employee and/or employee data, and in particular that of the Renault Distribution Network,
- carried out jointly by Renault with respectively, the Renault Commercial Subsidiaries and/or with Renault Financial Subsidiary. You can find out more about the processing that we carry out jointly with the Renault Commercial Subsidiaries by visiting their respective websites (please consult our Renault Commercial Subsidiaries directory)

- carried out as independent data controllers respectively by **(i)** the Renault Distribution Network, **(ii)** by the Renault Commercial Subsidiaries, **(iii)** by Third Parties to the Renault Group.

## **SECTION C. What did we change in this Policy when it was updated?**

In this update of our Policy, we specify the objectives and purposes of the processing pursued (in particular in the context of the provision of Connected Services) for which, as the parent company of the Renault Group, we act as data controller.

In this policy you will find information relating to:

**1- WHO PROCESSES YOUR PERSONAL DATA?**

**2- WHAT PERSONAL DATA DO WE PROCESS?**

**3- WHAT IS YOUR PERSONAL DATA USED FOR?**

**4- WHO HAS ACCESS TO YOUR PERSONAL DATA?**

**5- WHAT ARE YOUR RIGHTS?**

**6- HOW DO WE SECURE YOUR PERSONAL DATA ?**

**7- MODIFICATION OF INFORMATION**

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### **1- WHO PROCESSES YOUR PERSONAL DATA?**

For the purposes of this document, "we", "us" or "Renault" refers to Renault SAS acting as **data controller, within the meaning of the applicable regulations on personal data.**

Renault is located in France, at 122-122 bis avenue du Général Leclerc – 92 100 Boulogne-Billancourt. The contact details of its data protection officer are as follows: Renault SAS, Legal Department – Data Protection Officer, 122-122 bis avenue du Général Leclerc – 92 100 Boulogne-Billancourt or at: [dataprotection-com@renault.com](mailto:dataprotection-com@renault.com).

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### **2- WHAT PERSONAL DATA DO WE PROCESS?**

In general, we are committed to collecting only personal data that is relevant and appropriate for each of the purposes for which we process it (see section **3 - WHY IS YOUR PERSONAL DATA USED?**).

In this section, we explain the context in which your data is collected and the categories of data we collect.

#### **2.1. Collection from you**

In particular, we collect your personal data when:

- You visit one of our websites, which may use cookies or other trackers,
- You contact (\*) us through an online form, email, telephone, live chat, or any other means,
- You participate in a competition or event, or subscribe to one of our newsletters,
- You purchase a Vehicle or a Service (maintenance, repair, warranty, connected services),
- You are using a Connected Vehicle,
- You respond to one of our studies or satisfaction surveys,
- You create a user account to access our services from your computer or smartphone,

- You interact with us on the social media pages of which we are administrators (i.e. Facebook, Instagram, Twitter, Snapchat, TikTok, Pinterest, LinkedIn and YouTube pages) in particular via the "Like", "Share" or "Twitter" buttons of Facebook, Instagram and Twitter or "Comment", which may result in the collection and exchange of personal data between the social networks and us.

*(\*) As such, if applicable, the data that is essential to respond to your request or for the purposes of a contract or a legal obligation are indicated in the collection forms (in particular by asterisks). If you do not wish to provide the mandatory data, we may not be able to process your request or provide you with the relevant services. The other information is intended to get to know you better, in particular to send you personalized online advertising messages. This information is, therefore, optional.*

In any case, we invite you to keep us regularly informed in writing of any changes to your personal data.

The personal data we collect depends on our interaction with you and may include information regarding:

- Your **identity** and **contact details** (surname, first name, postal address, email address, telephone number, etc.), if applicable, collected during your use of our brand apps (for example My Renault app).
- Data related to your **personal situation**, for example when you make settings in your Vehicle (heating, charging the Vehicle, etc.) or your personal account in our app and/or **professional** (family situation, socio-professional category, etc.),
- Your payment **and** transaction **data** (type of payment, means of payment, discount granted, date of purchase, invoice, total amount, etc.),
- Data relating to our **commercial relationship**, in particular our interactions and contracts (order history, after-sales interventions, service contracts, in particular Connected Services, competitions, interactions with our customer service, etc.),
- The identification data **of your Vehicle** (make, model, registration, chassis number, etc.),
- Subject to your consent where required by applicable laws, your **geolocation data** (e.g. position data when using the emergency system, etc.),
- Data related to the use of the **Vehicle (mileage, route, use of multimedia**, features, for example: unlocking of the Vehicle, status of the doors (locking), windows, tyre pressure, oil level, status of the air conditioning control, status of the lights, condition of the parking brake, outside temperature, etc.) and possibly its **battery** (charge level, etc.),
- If you have a connected vehicle, data allowing the **control of the Vehicle** and possibly its battery (locking/unlocking, pre-conditioning, programming of the battery charge, etc.) or fuel level, relating to the **driving mode** (use of controls, acceleration, braking, etc.) or the **provision of connected services or on-board applications**,
- Data necessary to **carry out loyalty, prospecting, research and survey actions** (e.g. your preferences in terms of Vehicles),
- Data about your **digital profiles** (online accounts),
- Data concerning **the use of our websites and mobile applications**, as well as our communications (number of visits, page visited, opening of our messages, etc.).

## 2.2. Indirect data collection through Renault's subsidiaries and/or the Renault Distribution Network

### a) About the personal data we collect through the Renault's subsidiaries

We may obtain information about you indirectly through Renault Commercial and/or Financial Subsidiaries.

Any transmission is preceded by prior information to your attention and, if required by the regulations, by obtaining your consent (e.g. your consent to the lifting of professional secrecy to which Renault Financial Subsidiaries may be subject, your consent to receive commercial prospecting, etc.), or by a notice allowing you to object to this transmission.

#### b) About the personal data we collect through the Renault Commercial Network

Subject to compliance with applicable regulations, we may collect data about you through our Renault Commercial Network. This concerns your contact details, information relating to the Vehicle and the activities carried out within the Renault Commercial Network on your Vehicle (e.g. repair and/or maintenance history, details of workshop visits, accessories relating to the Vehicle you have purchased, etc.), as well as information allowing us to trace the history of our relationship with you (your contracts, discounts granted to you, your complaints, your preferences in terms of commercial prospecting, e.g. the communication channels through which you wish or do not wish to be contacted).

This sharing of information allows us to (i) provide you with services tailored to your needs within optimized timeframes, considering the history of your interactions within the Renault Commercial Network and (ii) measure and manage Renault Group's financial and economic performance, including measuring the profitability of Renault Group's activities in order to optimize our general and commercial processes (e.g. reduce costs, limit financial risk in the medium and long term, etc. and to make strategically relevant decisions for our sales and distribution activities).

#### c) About the personal data we collect through the Independent Commercial Network

The contexts in which the Independent Commercial Network share your data with Renault are marginal, insofar as it operates as an independent data controller regarding your personal data it collects, for example in the context of your interaction with its website notably when you requested information on Vehicle and/or Services, when you purchase a Vehicle from our Independent Commercial Network, when the Independent Commercial Network send you, if you consented, marketing campaigns, ...). However, when purchasing from our Independent Commercial Network a Vehicle which requires repair operations that falls under Renault's car manufacturer warranty, the Independent Commercial Network share with Renault your Vehicle's unique identification number and the identifiers of other Vehicle components (which can be linked to you as owner or lessee) in order to issue a refund of its expenses (ex: replacement of Vehicle parts and/or accessories under the warranty, labor expenses engaged for the replacement or repair of parts in connection with the warranty, ...).

### **2.3. We collect your data via third parties to Renault Group and/or the Renault Distribution Network**

We may obtain data about you through third parties to Renault Groupe and/or our Renault Distribution Network (hereinafter referred to as "Third Parties"), only after they have informed you and provided that they have obtained, where required by regulation, your prior consent.

These Third Parties may include:

- private database publishers, where you have agreed to provide your personal data;
- public publishers of databases (open data) within the limits of the applicable right of reuse (e.g. public registers, online newspapers, public directories, etc.);
- Third-party services (i.e. Brandwatch, in accordance with its data protection policy <https://www.brandwatch.com/fr/legal/user-privacy-policy/> and, Sprinklr, in accordance with its data protection policy : <https://www.sprinklr.com/privacy/>) in order to know your opinions posted on the internet about our brands, our Products and Services, notably their quality, those of our competitors as well as various specific related topics (Renault's new partnerships,

for example sports events partnerships, new products launch and/or reveals, ...), e.g. i) on social networks (i.e. Facebook, Instagram, Twitter, YouTube, Quora), (ii) publicly accessible sites (e.g. Reddit, online press and news sites) and (iii) and through other means, such as television, radio, print newspapers. This allows us to know and better understand your needs in order to optimize our decisions about our marketing strategies relating to our Products and/or Services and to improve their quality. However, this data will never be used to carry out marketing campaigns. In addition, this data also allows us to better understand your needs and our market in general.

**3- WHAT IS YOUR PERSONAL DATA USED FOR?**

We provide you with explanations about the context in which your data is collected, the purposes for which we process it and the length of time we keep it.

**3.1 – The purposes we pursue when processing your personal data**

In the context of our relationship, and depending on the context in which your personal data is collected, we may use your data to

- A – Managing our first interactions
- B – Managing our business relationship
- C – Manage the services provided by your connected vehicle and in-car applications
- D – Conduct studies and analyses
- E – Managing our marketing operations
- F – Managing our legal activities

**A – Managing our first interactions**

Objectives	Legal basis
Tracking visits to our websites or mobile applications and managing their operation and security.	This processing is based on your consent to the cookies deposited/read on your device (see the cookie policy of our website or mobile application), and on our legitimate interest (providing you with secure sites and applications)
Measurement and analysis of navigation and interactions with our social media accounts (e.g. our "fan pages") and/or with our sites with social plugins (e.g. "Like", "Share" or "Twitter", or "Comment") for the purposes of managing the promotion of our activities	We are responsible for this independent processing. We are required to jointly collect and transmit your data with these Third Parties when we integrate social plug-ins on our websites, social media pages or applications (to read the Highlights of the joint agreement with Facebook, (*). Joint responsibility does not include processing by these Third Parties after transmission (e.g. to improve their advertising system), carried out in accordance with the respective data protection policies (which can be found below (*): Facebook, Instagram, Twitter, Snapchat, TikTok, Pinterest, LinkedIn and YouTube).

(\*)

- Facebook: Joint Agreement  
[https://www.facebook.com/legal/controller\\_addendum?\\_sm\\_byp=iVVVVv1D3sDnQJV5&\\_sm\\_au\\_&\\_sm\\_aud=92513Boulogne-BillancourtCEDEX](https://www.facebook.com/legal/controller_addendum?_sm_byp=iVVVVv1D3sDnQJV5&_sm_au_&_sm_aud=92513Boulogne-BillancourtCEDEX)  
 Privacy Policy: <https://www.facebook.com/privacy/policy>
- Instagram: <https://privacycenter.instagram.com/policy>
- Twitter (X): <https://twitter.com/en/privacy>
- Snapchat: <https://values.snap.com/en-GB/privacy/privacy-policy>
- TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>
- Pinterest: <https://policy.pinterest.com/en/privacy-policy#section-your-options>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

## **B – Managing our business relationship**

<b>Objectives</b>	<b>Legal basis</b>
Management of your contracts (performance of services, e.g. mobility services)	This processing is justified by the performance of the contract you have concluded with us.
Management of your user accounts and means of authentication (e.g., ID Connect)	This processing is justified by the performance of the contract you have concluded with us.
Management of your participation in forums, communities	This processing is based on your consent.
Management of your complaints	This processing is based on our legitimate interest (prevention of legal claims)
Management of our satisfaction surveys, management, and response to your feedbacks, in order to improve customer satisfaction and our existing Products and Services,	This processing is based on our legitimate interest (improving our products and services)
Management of our consolidated and reliable customer database	This processing is based on our legitimate interest (having an up-to-date and consolidated view of the data)
A Vehicle recall (*) due to a quality issue  <i>(*) Please note that we operate this processing as data controller only if you are a customer of our Independent Commercial Network</i>	This processing is based on our legal obligations (regulation of defective products) and on our legitimate interest (ensuring the quality of our products)
Improving the quality of your requests through our call centers	This processing is based on our legitimate interest (*) (to better respond to your requests, to carry out training and/or evaluation of our employees, etc.)  <i>(*) However, you may object to this at any time and without giving reasons.</i>
Send you, at your request, information on Real Driving Emissions (RDE) measurements	This processing is based on our legal obligations

## **C – Manage the Services we provide to you with regard with your Connected Vehicle and the on-board applications**

Objectives	Legal basis
Ensure your safety on the road (emergency call, collision warning, white line departure detection, speed limiter and automatic emergency braking)	This processing is justified by the performance of the contract you have concluded with us or our legal obligations.
Provide and manage the Vehicle functionalities we provide (targeted advertising, roadside assistance, personalized insurance)	This processing is justified, as the case may be, by your consent or our legitimate interest (to provide you with relevant content) or by the performance of the contract you have concluded with us.
Ensuring the cybersecurity of systems	This processing is justified by our legitimate interest (providing you with secure systems)
Activate and supply your connected services and embedded applications, manage your accounts and associated contracts.	This processing is justified by the performance of the contract you have concluded with us
Support with combating theft (theft notification, tracking stolen Vehicles)	This processing is justified by the performance of the contract you have concluded with us
To provide you with connected services and on-board driving assistance applications (anticipation messages, eco-driving, parking assistance)	This processing is justified by the performance of the contract you have concluded with us
Remote control (vehicle and dashboard control)	This processing is justified by the performance of the contract you have concluded with us
Provide you with connected services and in-vehicle navigation application.	This processing is based on your consent
Manage and provide you with services related to your battery and connected services and associated on-board applications	This processing is justified by the performance of the contract you have concluded with us
Provide you with diagnostics, servicing and maintenance services for your Vehicles, systems and maps (warnings related to vehicle operation, MOT date reminder, remote software updates, proactive maintenance (*), predictive maintenance (**), etc.)  <i>Please note that (*) and (**) are not applicable to you if you are a customer of our Independent Commercial Network</i>	This processing is justified by the performance of the contract you have concluded with us.
Improve and develop our products and services as well as those of our Third Parties to the Renault Group	This processing is based on your consent
Comply with our legal and/or regulatory obligations	This processing is justified by our legal and/or regulatory obligations, resulting from national or European provisions.

## 1. Connected Services and Embedded Applications



In order to enjoy a unique driving experience, you have subscribed to innovative services offered by Renault requiring the collection of your personal data. These services are available on the My Renault app and/or your Vehicle's multimedia screen and may vary depending on the profile, model, version, characteristics of the Vehicle and the country concerned.

For more information on the personal data processed, the justification for the processing as well as the retention period for each specific Connected Service, please visit our page dedicated to Connected Services: **CONNECTED SERVICES AND EMBEDDED APPLICATIONS**  
(<https://www.renault.co.uk/renault-connect/connected-services-data.html>)

Please note that the provision of certain Connected Services requires the collection of location data (e.g., the "Vehicle Location" service). In this context, Renault attaches great importance to the confidentiality and security of this location data.

In addition, when the processing of location data is based on consent (for example, in the context of improving the products and services of Renault and/or its partners), the collection of your consent is specifically requested from the Vehicle's multimedia screen and/or the My Renault application. You may decide to withdraw your consent to the collection of this data, however we draw your attention to the fact that you will no longer be able to benefit, in whole or in part, from your Connected Services.

In addition, certain Connected Services (or embedded applications) to which you have subscribed require the use of services offered by Google, one of Renault Group' Third Parties partners.

Depending on the model, version and characteristics of the Vehicle as well as the country concerned, you may have the "Navigation" and/or "Infotainment" Packs.

The **Navigation Package** provides access to the Google Maps app for navigation via the Vehicle's central openR link display and on the dashboard, as well as the Google Assistant app, which allows you to use your voice to trigger navigation, vehicle functions or obtain information without taking your eyes off the road. This pack also allows you to download apps from Google Play from the central openR link screen of the Vehicle.

The **Infotainment Pack** allows you to use applications downloaded from Google Play (media applications, audio streaming, etc.) from the vehicle's central openR link screen.

You can obtain more information about the processing of your personal data by Google by consulting its personal data protection policy available at the following address:  
<https://policies.google.com/privacy?hl=fr>.

Finally, please note that when one of your Connected Services expires, we send you messages in the screen of your Vehicle and/or your My Renault account in order to notify you and offer to renew it if necessary.

## 2. Improvement and development of Products and/or Services

Your data may also be collected to improve and develop Renault's Products and Services as well as those of our third-party partners at Renault Group. This collection allows Renault to renew its offers so that you can benefit from new developments and technological developments in the automotive sector. The data collected, based on your consent, includes location, technical and Vehicle usage data.

This data, when processed, is subject to appropriate technical measures (such as pseudonymisation and/or anonymization) and is kept for a period of eight years, with the exception of location data, which is kept for three years.

In order to preserve your privacy, we anonymize your data as far as possible in order to prevent any re-identification.

In particular, some of the personal data we collect in the context of the provision of Connected Services is shared with our third-party partners at Renault Group for the purpose of improving and developing their products and services. The sharing of this data allows them to actively contribute to the improvement of road infrastructure, road traffic and the development of mobility services. You will find below the categories of third-party partners of Renault Group to whom we send certain data:

- Equipment manufacturers
- Energy suppliers
- Mobility Service Providers
- Local authorities
- Mobility organising authorities
- Road infrastructure managers
- Data brokers
- Software Publishers/Virtual Assistant Providers

To learn more about our third-party partners at Renault Group, please refer to the information below:

- BOSCH (OEMs, suppliers to the automotive industry):  
[https://privacy.bosch.com/data\\_protection\\_notice\\_bosch\\_services\\_and\\_products.ppf](https://privacy.bosch.com/data_protection_notice_bosch_services_and_products.ppf)
- CERENCE: <https://www.cerence.com/>

### 3. Compliance with our legal and/or regulatory obligations

As a car manufacturer, Renault may be required to collect personal data concerning you within the Vehicle that is strictly necessary to achieve the objectives pursued by the legislative and/or regulatory texts (eCall (Emergency Call), OBFCM, EDR, LOM, ISA, etc.).

With particular regard to the European OBFCM (On Board Fuel Consumption Monitoring) regulation, based on on-board devices for monitoring fuel and/or energy consumption in new light Vehicles, it is the responsibility of Renault to collect usage and technical data on the said Vehicles in order to communicate them to the competent European authorities. However, if you are the owner of the Vehicle, you can object to the collection of data by referring to section 5 "What are your rights?" of our Policy.

### 4. Activating and suspending your services

Information about activating your Services, sharing your data, and suspending it is available here (<https://www.renault.co.uk/renault-connect/data-activation.html>)

You can change your privacy preferences and settings for this purpose.

We are committed to respecting your privacy, but we remind you that it is your responsibility to inform any other user or buyer of the Vehicle of the conditions under which their data is processed by Renault.

## **D – Conducting studies and analyses**

Studies and analyses are carried out in order to measure our performance, assess the quality of our products and services and the level of customer satisfaction, and continuously improve them.

Objectives	Legal basis
Invite you to respond to studies in the context of the development of new products and services, to measure our brand image	This processing is based on your consent
Perform analytics to measure our business performance, including the effectiveness of our marketing operations.	This processing is based on our legitimate interest (measuring the performance of our business)
Research and development of new Products and Services	This processing is based on our legitimate interest (improving our Products and Services) or, your consent in regard of the Connected Services
Ensuring the quality of our Vehicles and parts, in particular through incidentology and durability studies	This processing is based on our legitimate interest (improving our products) and/or, when applicable, on our legal obligations, notably in regard with Vehicle's and/or Products security and/or quality standards
Carry out analyses to improve our customers' satisfaction.	This processing is based on our legitimate interest (improving our products and services)
Perform analytics to monitor, measure, and optimize our operational and financial performance	This processing is based on our legitimate interest (to improve the performance of our business)

### **E – Managing our marketing operations**

Objectives	Legal basis
Sending advertising campaigns (digital or not), including newsletters	This processing is based on your consent or our legitimate interest (providing you with relevant content)
Contests, events, sponsorship	This processing is based on the contract (acceptance of the payment)
Online Advertising Targeting, Content Personalization	This processing is based on your consent to the cookies deposited/read on your device (see the cookie policy of the Renault website on which you are browsing)
Advanced analysis to personalize marketing (profiling) and improve knowledge of our customers and our market (*).  <i>Please note that (*) is not applicable to you if you are a customer of our Independent Commercial Network</i>	This processing is based on our legitimate interest (to better understand the behavior of our customers and prospects and/or to provide you with relevant content).

### **What do we do as part of our marketing operations?**

The marketing operations we carry out allow us, if you consented, to:

- send you advertising campaigns (e.g. by email),
- display advertisements on the websites you visit and on social networks
- adapt the content of Renault Group' websites to your interests,
- distribute content on our social networks and measure the audience and the effectiveness of our advertisements
- analyze certain data about you in order to understand your preferences and interests and thus offer you more tailored and personalized content (see more details on profiling below).

We remind you that we only collect and analyze your data to personalize advertising if you have agreed to the deposit of one or more of the corresponding cookies, which are described in our cookie policy and which you can manage at any time via the cookie management module available on all websites and mobile applications that Renault edits. In cases where we only analyze our online media campaigns, without personalizing advertising, we do not collect your data through cookies, but directly from you and our partners ("Third Parties").

In addition, we only send you advertising if you have expressly agreed to receive it (for example, by ticking a box in a contact form that you send us, when creating your MyRenault user account, etc.).

### **Where does your data come from, which we process as part of our marketing operations?**

To manage our marketing operations and in particular to personalize the advertising and content we display to you, we analyze your data from **several data sources** as well as through the use of **dedicated IT tools**.

Indeed, our analyses are based on data that our customers have directly provided to us (for example, by purchasing a service on our store dedicated to subscribing to a Connected Service, or, for example, data relating to navigation on our websites and the use of our mobile applications) as well as data from our partners (e.g., your browsing data on Facebook websites).

The data provided by our partners is data **collected by the deposit of cookies** that you have authorized. Depending on the tool, the data we use may include identification data (surname, first name, contact details), technical identifiers (the IP address of your device, technical identifiers assigned by Renault Group or our partners to your device), browsing and connection data (pages viewed, sites visited, clicks).

### **What are the tools that allow us to carry out these operations?**

To manage the marketing operations referred to above, we use various tools.

The data we use to manage our marketing operations is analyzed in our own internal tools and databases as well as in tools developed by our partners (such as Facebook or Google) and/or the subcontractors we use.

In these tools, we generally **only store** the data collected through the deposit of cookies for a maximum period of 25 months. However, some of these tools do not store any data once the processing of this data is carried out.

### **How do we provide you with personalized content and offers online?**

The use of these tools allows us to carry out **profiling**, i.e., to evaluate the preferences of our customers, within the meaning of the applicable regulations on personal data. We believe it is in our legitimate interest to understand the preferences of our customers and prospects in order to provide them with content that matches their needs or desires.

For example, profiling may lead us to show you an advertisement relating to an offer of connected services to an automotive segment that you are likely to prefer (an SUV rather than a city car, or vice versa). Profiling also allows us **not to send you** advertising offers if we understand that they will not match your interests, or to limit the number of times you are shown the same advertisement.

**We would like to inform you that although these operations lead to fully automated decisions** (e.g. displaying a certain offer to you rather than another), **they do not produce any legal effect or effect that could significantly affect** you (i.e. the personalized offers we display to you do not lead to a change in your situation or to deprive you of the possibility of benefiting from a right). If, however, you would like to know more about the methods available to you to manage the receipt of content and advertising, including online, from us, we invite you to read section 5 - WHAT ARE YOUR RIGHTS AND HOW TO EXERCISE THEM? in particular paragraph 5.1 relating to the right to object).

**To understand how we process your data in concrete terms, here we provide you with an example:**

You are looking for an electric vehicle and you go to one of the websites edited by Renault Group to find out about the Vehicles.

When you arrive on the website edited by Renault Group, you accept all cookies thanks to the cookie management banner. You then click on some electric Vehicles you are interested in to get more information about those Vehicles.

A few days later, while browsing the internet, a Renault Group' advertisement appears on the web page you are on, displaying a MEGANE e-Tech. You click on it and are redirected to the page presenting the Vehicle.

Renault Group has been able to display this advertisement about a Vehicle that you may like thanks to the cookies that you have agreed to be placed on your terminal. Group Renault was thus able to identify that you were interested in electric Vehicles and was therefore able to launch a personalized campaign to adapt the advertising displayed to you.

**For more information:**

**On the role of our partners in the processing of your data:**

We enter into a contract with each of our partners, which sets out our respective obligations and responsibilities in the processing of your personal data, in accordance with the requirements of applicable regulations.

Under these contracts, we and our partners have different roles and responsibilities in the processing of your data:

- To collect data from visitors browsing Renault Group websites and to transmit them to our partners, we are joint data controllers with our partners who place cookies on our websites.
- For the analysis of the collected data and any further processing of the data, we and our partners each act as an independent data controller.

- Finally, some partners act as processors and only process data on our instructions.

**On Renault Group’ partners (hereafter referred as “Third Parties”) and their data protection policies:**

To learn more about how the Meta Group (formerly Facebook) processes your data, including the legal basis and ways to exercise your rights with Meta, please refer to Meta's privacy policy: <https://www.facebook.com/privacy/policy>

To find out more about how the Google Group handles your data, please refer to Google's privacy policy: <https://policies.google.com/privacy?hl=en>.

To find out about Renault Group's other partners, you can consult the list of these partners in our Cookie Policy and refer to the privacy policies of these partners available on their websites.

**F – Managing our legal activities**

Objectives	Legal basis
Management of our litigation, pre-litigation, amicable, security or regulatory files	This processing is based on our legitimate interest in following our legal records, and may in some cases be based on our legal obligation to retain and provide information to authorized authorities
Respond to any requests you may have to exercise rights in relation to your personal data (see the section "What are your rights")	This processing is based on our legal obligations and may require verification of your identity

If we undertake or participate in a merge, acquisition, restructuring, disposal of assets or bankruptcy or insolvency proceedings, before transferring, selling or disposing in connection of such activities, all or a portion of its assets (which include in particular personal data of customers and/or prospects), we will inform you.

**3.3 – How long we keep your data**

In accordance with the regulations, we undertake to keep your personal data only for as long as necessary to achieve the purpose pursued, to meet your needs, or to meet our legal obligations.

In order to determine this duration, we consider the following elements:

- The duration of your contract,
- The time it takes to process your request or complaint,
- The length of time your user account is open, except in the case of inactivity for 3 years,
- Your interest in our brands,
- The need to keep a certain history of your interactions with us, for the proper management of our commercial relationship, this duration varying in particular depending on whether you have purchased a Connected Service, created your personal account or simply interacted with us without entering into contracts with us,
- Our legal or regulatory obligations (this is particularly the case for the technical data of our Vehicles).

When we no longer need to use your personal data, it will be deleted from our systems and records or anonymized so that you can no longer be identified. However, we may need to keep some of your

personal data in an archive in order to be able to respond to any legal action, for the limitation period provided for by applicable law.

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## **4- WHO HAS ACCESS TO YOUR PERSONAL DATA?**

### **4.1 – Certain Renault Group' subsidiaries**

Subject to applicable obligations, we may share your personal data within Renault Group, which uses it in accordance with its own personal data protection policy (also available by clicking on the link provided above) to:

- update your data and/or acquire additional information relating to our customers for the purposes of direct commercial prospecting, including personalized marketing, in accordance with the applicable legal requirements for prospecting,
- improve knowledge of our customers (e.g. new appetites, etc.) and/or the automotive market (e.g. identify new needs and opportunities),
- measure and manage Groupe Renault's financial and economic performance, including measuring the profitability of Groupe Renault's activities in order to be able to optimize our general and commercial processes (e.g. reduce costs, limit financial risk in the medium and long term, etc.) and to make strategically relevant decisions for our sales and distribution activities,
- To offer Groupe Renault customers a unique means of authentication to the various applications and/or customer areas of our brands.

Any sharing of data with these Renault subsidiaries is governed by one or more contracts by which we require them: (a) to ensure a level of protection of your personal data equivalent to ours, (b) to inform you in accordance with the applicable regulations and (c) to process the data only for the purposes listed above.

To find out how you can object to our sharing of data with the Renault Subsidiaries listed above, see section 5 below.

### **4.2 – Independent Commercial Network**

To meet our duty as car manufacturer to follow up on our Vehicle and Products, it requires us to take steps to inform you and to undertake actions which are appropriate. Therefore, although you purchased Renault Group' Vehicle and/or Products through our Independent Commercial Network we may share personal data (ex: your vehicle's unique identification number, ...) with this latter when it is necessary to launch a recall or service campaign. In this case, we share your personal data with our Independent Commercial Network to allow this latter to notify you as soon as possible, and to contribute to the compliance with safety obligations and to participate in the actions undertaken and/or required within our car manufacturer's legal obligations.

### **4.3 – Service providers operating on our behalf**

In order to process all or part of your personal data for the purposes we have brought to your attention above, we use companies acting on our behalf as data processors, according to our contractual instructions. These include :

- IT service providers in charge of hosting, operating or maintaining our databases, websites and mobile applications,
- providers providing authentication management services,

- Approved service providers operating in banking matters (\*) providing us with remote payment and/or recurring payment management solutions (e.g. subscriptions, etc.) on our websites and/or applications requiring it.
- Service providers involved in customer relationship management (call centers, provision of communication tools, etc.)
- service providers in charge of providing services relating to our marketing, in particular the sending of commercial offers, the organization of competitions, events, and/or the carrying out of studies and surveys.

*(\*) please note the following exception: these service providers are required to carry out by virtue of their legal obligations in the context of a payment that you initiate on one of our sites and/or applications (in particular obligations to control funds in accordance with the Directive on money laundering and terrorist financing and anti-fraud). For this processing, these Service Providers act in accordance with their own data protection policy.*

Finally, you are informed that certain Renault Subsidiaries may act as personal data processors, to process your data according to the instructions we give them. In particular, the following act as processors of personal data:

- Renault Group's parent company (e.g. management of certain Renault IT tools and applications)
- Certain Renault subsidiaries provide services (e.g. invoicing, or IT services)
- Our Commercial Network when it acts on our behalf.

In any case, we make sure that we only work with trusted actors and that we secure these relationships (contracts, audits, security guarantees and tests, etc.) and that only persons duly authorized to process your personal data with regard to their functions and missions are authorized to do so.

#### **4.4 – Entities outside Renault Group**

We may, in some cases, share some of your personal data with Third Parties to the Renault Group. We inform you of this sharing and we make sure to ask for your consent prior to sharing when required by law. We enter into a contract with each of these Third Parties, which sets out our respective obligations and responsibilities in the processing of your personal data, in accordance with the requirements of applicable regulations.

#### **On the role of these Third Parties in the processing of your data:**

As part of our contracts with these Third Parties, we have different roles and responsibilities in processing your data, for example:

- To collect data from visitors browsing Renault Group websites and applications and transmit them to third-party partners, we are joint data controllers with our partners who place cookies on our sites. To find out which of Renault Group' Third Party Partners, you can consult the list we provide in our Cookie Policy and refer to the Privacy Policies of these Third Party Partners, accessible on their websites.
- For the analysis of the collected data and any further processing of the data, we and our Third-Party partners each act as an independent data controller. For example, social media platforms such as Facebook may produce activity reporting and statistics in anonymized form from visits to the "fan page" for the purpose of managing the promotion of Renault's business and may also use them to improve their advertising system. To learn more about how the Meta Group (e.g.,



Facebook) processes your data, including the legal basis and how to exercise your rights with Meta, please refer to Meta's Privacy Policy: <https://www.facebook.com/privacy/policy>

For more information on how the Google Group handles your data, please refer to Google's privacy policy: <https://policies.google.com/privacy?hl=en>

For the display of content that may be of interest to you in advertising spaces on the platforms of third-party partners of Renault Group that you are likely to visit after consulting our sites and/or applications, we may act as a joint data controller with these partners.

#### 4.5 – Authorized third parties

We may also share certain personal data about you with authorized third parties (i.e., as the case may be, authorities, administrations and/or bodies authorized by law or regulation to order us to provide us with documents or information containing personal data) in order to comply with any legal obligation or decision administrative or judicial authorities.

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## **5- WHAT ARE YOUR RIGHTS?**

### **5.1- Your rights**

You have several rights under the regulations relating to the protection of personal data:

**A right to object to the processing of your personal data**, subject to justifying reasons relating to your particular situation, and a right to request the limitation of the processing of your personal data, in certain cases provided for by the regulations. In this case, we will no longer process this personal data, unless we have compelling legitimate grounds to do so which override your interests, rights and freedoms, or if such processing is necessary for the establishment, exercise or defense of legal claims.

**A right to object to any commercial prospecting**: you can at any time request to stop receiving our communications relating to our offers, news and events. This right can be exercised via the unsubscribe link in each prospecting email. You can also **object to being profiled**. You can also **object to being profiled in connection with these marketing communications**.

In accordance with the regulations applicable in your country, you may have the right to register to an anti-call for commercial purposes by telephone-solicitation system, opposition lists. For example, in France, you can register free of charge on the Bloctel opposition list, managed by the company Oposetel, in order not to be the subject of commercial solicitations by telephone.

**A right to withdraw** your consent at any time, for the purposes for which we collected your consent.

**A right to information**: You have the right to obtain clear, transparent and comprehensible information about how we use your personal data and about your rights. This policy is an example of that.

**A right of access to your personal data** : you have the right to obtain information regarding the processing of your personal data (in particular the data that is used, all available information as to the origin of the data where you have not provided us with your personal data directly, for what purposes we use it, the recipients and/or categories of recipients with whom your personal data has been transmitted, the retention period that we put in place with regard to your personal data, etc.) as well as a copy thereof.

**A right to rectification:** You have the right to have your data rectified if it is inaccurate or incomplete, despite our efforts to keep it up to date, which will allow us to comply with our obligation to have up-to-date data about you.

**A right to the portability** of your data, i.e., under certain conditions, the right to receive the personal data you have provided to us, in a structured, commonly used computer format, and to have it transmitted to a third party if technically feasible.

**A right to erasure (or right to be forgotten):** you have the right to have your data erased or deleted. This right may be limited with regard to our contractual obligations (current contract) or legal obligations (prevention of legal actions in particular).

**A right to limitation :** you have the right to exercise this right if i) you wish to contest the accuracy of your personal data or ii) you need the data processed by Renault to exercise or defend your rights in court and you wish to protect yourself from any possible deletion by Renault (e.g. in the event that the retention period has been legally reached, Renault no longer has operational needs to keep this data, ...). We inform you that you have this right by default when you have objected to processing based on Renault's legitimate interest by justifying reasons relating to your particular situation, while we verify whether the legitimate grounds on which we base this processing override your interests, rights or freedoms.

If applicable, **you have the right to define directives**, either general or specific, with regard to certain processing operations, for the retention, deletion and communication of your personal data in the **event of your death**. You can change or delete these guidelines at any time. You can inform us of these specific guidelines by writing to the address below.

Finally, you have the right to **lodge a complaint with your competent supervisory authority** in your country for the protection of personal data. We encourage you to contact us before making any complaints, so that we can try to resolve your issue together.

## 5.2- How to exercise them?

You can update your contact details directly in your user account (MY Renault, MY Dacia, etc.).

To exercise any of your rights, you can contact us your request at any time by email **dataprotection-com@renault.com**, or by post to Renault's Legal Department – Data Protection Officer, 122-122 bis avenue du Général Leclerc – 92 100 Boulogne-Billancourt, France. We may ask you for certain information or documents (ID, vehicle registration) when we are unable to identify you or to identify your Vehicle data.

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## **6- HOW DO WE SECURE YOUR PERSONAL DATA?**

Your personal data is stored on secure servers. We implement, and require from our subcontractors and partners, appropriate security and data protection measures, in line with the latest technologies.

When the processing of personal data involves its transfer, we ensure that this transfer is carried out under appropriate conditions guaranteeing an adequate level of protection, security and confidentiality.

As part of the creation of a digital account, the entry of a password that complies with our security standards is mandatory and is part of our privacy policy. It is your responsibility to keep it secret.

As far as possible, your data is processed within the European Economic Area (EEA). However, as some of our service providers or their subcontractors are located in countries outside the EEA, your personal data is processed in those countries. Some of these countries may have different regulations on personal data than the European Union. In such a case, we pay particular attention to ensuring that this transfer is carried out in accordance with the applicable regulations and put in place guarantees ensuring a level of protection of your privacy and fundamental rights equivalent to that offered by the European Union (in particular through the use of the European Commission's Standard Contractual Clauses). Upon request to the address listed in the "What are your rights" section, we can provide you with more information about these transfers (including the European Commission's Standard Contractual Clauses).

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## **7- MODIFICATION OF INFORMATION**

We may change this information from time to time. Where necessary or required, we will notify you and/or seek your consent. We therefore invite you to consult it during each visit in order to be aware of its latest version.

*This version replaces the previous version (which came into effect in December 2022).*

*This new version is an in-depth overhaul of the previous version. It is intended to be more accessible and comprehensive. You will find there the full terms and conditions of use of your personal data (in particular the exhaustive list of our purposes as the parent company of Renault Group, car manufacturer).*

*In particular, we have strengthened the information relating to the processing of your personal data for Connected Services and embedded applications is now included in this Policy.*

*This version also provides more transparency about the recipients of your personal data, both within and outside to the Renault Group.*

*Last update of this Policy : October 2023*

## **8 – USEFUL DEFINITIONS**

**"Connected Services"** refers to intangible functionalities, for a fee or free of charge, intended for owners or users of the Vehicle, which improve the driving experience/relationship and quality of service, by means of on-board connectivity in the Vehicle. This connectivity is based on linking the Vehicle with an ecosystem external to Renault and/or a Third Party. Connected Services are used in the Vehicle or via an application on a smartphone or tablet interacting with the Vehicle. In addition, some Connected Services enable Vehicle owners to access functionalities provided by the manufacturer Renault or by a Third Party, whose main purpose is to ensure the proper functioning of the Vehicle during its life cycle.

**"Data Controller"**: refers to in this Renault, parent company of the Renault Group, which alone or jointly (when specified in this Policy), determines the purposes and means of the processing brought to your attention via this document.

**"Joint controller"** or **"joint controller"**: these two terms are synonymous. When we tell you that we are a joint controller with one or more other legal entities, this means that we determine together with them how and why your personal data is used, by means of a joint decision or several respective

convergent decisions. When, together with other entities, we determine the purposes and means of the processing, we inform you that we have this status, the identity of other data controllers and specify how we have divided up the obligations arising from the applicable regulations with that we make available to you. In this document you will find the answer to some of your questions, for example which entity has been responsible for responding to the exercise of your rights, which entity is responsible for ensuring the implementation and maintenance of security measures with regard to your personal data, what happens to your data if the joint processing ceases, etc.

**"Personal Data"** means any information about you, which alone or in combination with other information can identify you either directly (such as your name, e-mail address, ...) or indirectly (e.g. by using a unique customer number, your Vehicle's unique identification number, ...).

**"Processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or interconnection, restriction, erasure or destruction.

**"Processor"** means the natural or legal person, public authority, agency or other body which processes personal data on behalf of and on the instruction of the Controller. As part of this policy, we remind you of the categories of activities involving the processing of personal data that we entrust to data processors (see Section 4.2 above for more information)

**"Products"**: refers to the Vehicles as well as accessories and original parts supplied by Renault or Renault Commercial Subsidiaries, and which may be use are used by the Renault Distribution Network to operate repair activities on Vehicle.

**"Renault Distribution Network"**: refers to the sellers, re-seller and/or dealers and/or repairers with whom Renault or Renault Commercial Subsidiaries have signed commercial agreements for the sale of the Vehicles and/or for the provision of Services and/or Products.

**"Services"**: refers alternatively or cumulatively, depending on the contract you have subscribed to with Renault or Renault Commercial Subsidiaries, Renault Commercial network or Independent Commercial Network, the maintenance, repair, warranty or Connected Services associated with your Vehicle.

**"Third Party"**: entities external to the Renault Group that may communicate your personal data to us only after having contractually assured us that they have obtained your consent or that they have another legal basis legitimizing their communication/sharing of this data with us. This definition also includes entities other than Renault Group with whom we may share your data after assuring us that we have obtained your consent or if we have another legal basis that legitimizes their communication/sharing.

**"Vehicle"**: refers to the vehicle(s) of Renault Group' brands, namely Renault, Dacia, Alpine and Mobilize.