

Privacy Notice

Mocean subscription

Version: 29.04.2025

1. What is this Privacy Notice about?

The purpose of this privacy notice (hereafter referred as "**Privacy Notice**") is to inform you about the collection and processing of your personal data in connection with the provision of Mocean services (hereafter referred as "**Mocean services**" or "**Services**").

We take your privacy very seriously and will only process your personal data in accordance with applicable data protection laws.

Capitalised terms that are not defined in this Privacy Notice shall have the same meaning as those defined in the [Terms and Conditions](#).

2. Who is responsible for processing my data and how can I contact the data controller?

Hyundai Connected Mobility GmbH with its registered office at Kaiserleipromenade 5 63067 Offenbach, Germany (hereinafter, "**HCM**", "**we**", "**us**"), is responsible for the processing of personal data processed primarily for registration and participation in the "Mocean Subscription" program, provided by us. In this clause, you will be informed about how we will use your personal data and about your rights under the General Data Protection Regulation ("GDPR").

If you have any questions regarding the processing of your personal data, please contact us as: HCM.dataprotection@hyundai-europe.com or reach out to our Data Protection Officer of HCM at the following address:

Hyundai Connected Mobility GmbH c/o Data Protection Officer Kaiserleipromenade 5 63067 Offenbach, Germany.

3. What categories of personal data are processed, for what purposes and on what legal basis?

[Our customers]

3.0. User Registration

We process your personal data for the purpose of registration of the user account in Mocean platform. In order to complete your Registration, you can use your Hyundai account.

For this purpose, we process your name and surname, contact data (email address and phone number, home address) language, country, home address and password for the purposes of execution of the contractual relationship between HCM and you (Article 6.1.b) GDPR).

Privacy notice of Hyundai account is available [here](#).

You can also register, using your Google single sign on (SSO). Privacy notice of this service is available [here](#).

Registration requires that you go through the Verification Process (see section 3.1).

3.1. Verification Process

3.1.1. Driving license verification

We will process your driving license to verify your identity and check if you fulfil our eligibility criteria. For this purpose, we use an external provider who verifies submitted documents and assesses the risk of potential fraud.

We process images of your driving license, together with information extracted from the document electronically for the purposes of execution of the contractual relationship between HCM and you (Article 6.1.b) GDPR).

Furthermore, to ensure a diligent eligibility verification process we share your name, address, date of birth, driving license number with the Driver and Vehicle Licensing Agency (**DVLA**) via our trusted partner, who follows the DVLA process for checking your driving license status. It allows us to verify date of driving entitlements, endorsement

details, disqualifications, convictions (if applicable), expiry dates as well as address information.

We check your driving license status and process this personal data on the basis of your consent (art. 6.1.a) GDPR). The consent may be withdrawn at any time. The withdrawal

of consent does not affect the lawfulness of processing based on consent before its withdrawal.

3.1.2. Creditworthiness check and fraud prevention

We will process your personal data to reduce the risk of default, the vehicle not being returned, and fraud in your name. We check your creditworthiness before entering into the MOCEAN Subscription contract with you. The creditworthiness check is done by a way of financial scoring (profiling) which is a partially automated process and which we perform in cooperation with our partners.

Such creditworthiness information contains probability values (score values), which are calculated using scientifically recognized mathematical-statistical methods. The data is incorporated into the calculation of the score value with different weightings. We will then use the information obtained from our partners, based on such analysis, to decide whether and under what payment conditions we will make a vehicle available to you.

We will share with our credit verification partner (Credit Scorer) personal data provided by you such as name, surname, postal address, date of birth, monthly net income, bank account number and sort code, who then conducts an analysis based on the data stored in the Credit Scorer's databases in order to assess your creditworthiness as well as estimate the probability of your financial payment behaviours in the future.

Additionally, during the part of the financial verification, you will be asked to provide us with the information about your employment status, marital status, residential status, number of dependents, monthly mortgage/rent/board, monthly bills/cost of livings, monthly credit outgoings and monthly total repayments. We will use this data together with data from Credit Scorer to properly assess your affordability and estimate costs on individual circumstances' basis, which is a Financial Conduct Authority (**FCA**) requirement.

Furthermore, to ensure the proper Verification Process as set out in 3.1.1 and 3.1.2, you will be asked to provide us with income confirmation (e.g. payslips, proof of income etc.) to ensure that the declared information is accurate.

In order to detect potential fraud, we will share your personal data such as your name, surname and address with Credit Scorer. In some cases, Credit Scorer may return the information about criminal convictions and offences which under the GDPR constitute special categories of personal data.

Taking into account the value of the Subscribed Vehicle, conducting a creditworthiness check is necessary for entering into a contract to reduce the risk of non-payment, checking accuracy of provided data and to verify if you can meet the financial obligations of selected type of the contract. We conduct creditworthiness check on the basis of your consent (art. 6.1.a) GDPR). The consent may be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Additionally, we use this process to detect, investigate and prevent fraud which is our legitimate interest (art. 6 (1) f) GDPR).

Cooperation with 3rd parties for the purpose of creditworthiness check and fraud prevention

For the above process, we share your personal data with our local partner – **TransUnion International UK Limited (TransUnion)** which is a credit reference agency providing services such as credit risk and affordability checking, fraud prevention, anti-money laundering, identity verification and tracing.

TransUnion may also share your personal data with its contractual partners in the European Economic Area and Switzerland and, if applicable, other third countries, to assess your creditworthiness as well as to detect fraud.

Please note, that TransUnion processes personal data within the framework of its own privacy notices, as separate data controller. You may consult the privacy notice of TransUnion under this link: <https://www.transunion.co.uk/legal/privacy-centre>.

Right to human intervention:

You have the right not to be subject to decisions based solely on automated processing. At your request, any assessment of your creditworthiness will be reviewed by one of our employees, and in this regard you may also express your opinion or challenge the decision. More information about this possibility you can find in our Terms and Conditions in section 4.

You may have a right to explain or disagree with an entry or entries on your credit file. Please contact TransUnion directly if you have any queries related to this.

Due to the fact that conducting creditworthiness check is necessary for the conclusion and execution of the MOCEAN Subscription contract, as a result, we are required to regularly share information about you with Credit Scorer. This includes your positive data i.e. information about lack of any negative payment history or non-contractual behaviour, as well as information about any your default payments. More information about reporting default payments you can find in section 3.6.

The legal basis for sharing positive data with Credit Scorer is the legitimate interest pursued by the third party i.e. Credit Scorer. The Credit Scorer's interest is to ensure that Credit Scorer's contractual partners, who intend to conclude a credit agreement

with individuals receive an objective and reliable creditworthiness assessment of potential customers (art. 6.1.) GDPR).

3.2. **Provision of Mocean services**

We process your personal data for the purposes of providing the Mocean services. This includes, vehicle inspection and handover, monitoring and follow up, communication during the subscription period, insurance and responding to your queries.

For those purposes, we process the following scope of data:

Your name and surname, contact information (address, email address, phone number), information related to your driving licences, content of your communication with us,

data on the use of the subscription vehicle (e.g. mileage, paid price, location, battery status, registration number, model.), billing data (credit or debit card numbers).

We also collect data with regards to your actions on the Mocean platform, including your choice of vehicle (model, colour, subscription duration etc.), your progress in our onboarding journey, time and date of your activities on our website, etc.

We process your personal data for the purposes of execution of the contractual relationship between HCM and you (Article 6.1.b) GDPR).

In this context, we also share your data with our partners for the purposes necessary for provision of the Mocean services (i.e. insurance, debt collection etc). For the list of our partners, please refer to chapter 5 of this Privacy notice.

3.3. **Geo-localizing the vehicle for security purposes**

Hyundai vehicles are equipped with geolocation features which allow us to access information about the Subscription Vehicle's location.

We process your location data for the purposes of safety and to prevent vehicle theft or misplacement (art. 6.1.f) GDPR).

We will only access location information if:

- you have requested it OR
- we have been requested to do so by authorised authorities as part of their investigation proceedings and under the conditions set out by the law; or
- we have reasonable and justified reasons to believe that the Subscription vehicle has been stolen or driven outside the territory indicated in your subscription agreement.

3.4. **Conducting satisfaction surveys regarding the use of the Mocean Subscription platform to enhance the user experience.**

We also process your data in order to conduct satisfaction surveys regarding the use of the Mocean Subscription platform to enhance the user experience.

You are not obligated to participate in any survey.

If you do participate in a survey, we will process the following personal data: name and surname, email address, information about your subscription vehicle and your response to the survey.

The legal basis for the processing of data is our legitimate interest related to enhancing the user experience and improving our services (art. 6.1.f) GDPR).

3.5. **Contact with interested parties**

We are going to process your data for the purpose of responding to inquiries through the Mocean platform (contact form/live chat / contact center) or supporting you in case of technical issues, i.e. in the onboarding process.

In such a case, we will process your personal data in relation to: email address, phone numbers, content of the communication.

The legal basis for the processing of data is our legitimate interest related to assuring proper communication and high quality of customer care (art. 6.1.f) GDPR).

3.6. **Data sharing in relation to exercise of claims**

In case of default in payment, and subject to relevant laws, we may share your personal data with TransUnion which is our Credit Scorer partner (as described in section 3.1) as well as with credit agencies. TransUnion may take this data into account in the determination of the probability values (financial scoring value) in the future and share it with credit agencies. Further information about how TransUnion processes the

personal data for above purpose is available at <https://www.transunion.co.uk/legal/privacy-centre>.

We may share your data if you have received at least two written reminders after the debt becomes due, with the first reminder being sent at least four weeks before the second, and if you have not disputed the debt.

The legal basis for the processing of data is our legitimate interest related to the need of exercising and collecting debts, including asset recovery (art. 6.1.f) GDPR).

3.7. Data Analysis for the purpose of customer classification and product improvement

We will process the data of our customers for the purpose of analysis and enhancement of the products, more accurate classification of our customers and better communication.

For this purpose, we will process the data collected in relation to provision of Mocean services and conducting customer surveys.

The legal basis for the processing of data is our legitimate interest related to the need to gain meaningful insights related to our customers and provided services (art. 6.1.f) GDPR).

3.8. Marketing and personalized communication

If you have granted a separate marketing consent, we will send you marketing communication related to products and services of HCM and the Hyundai Group via email, mail, phone and messenger services. We may personalise this communication by way of using procedures to analyse your preferences and interests as well as your use of our products and services. Personalised communication will include Hyundai products and services, offers and events as well as invitations to market research and surveys, which is based on your preferences and behaviours as well as your use of Hyundai products and services.

For this purpose, we will create an individual user profile of you to send you relevant and personalised communication. Please note, to personalise your communication we may use procedures to analyse your preferences and interests as well as your use of

our products and services. You will find more information in the section *Data analysis and segmentation to optimize and personalize our marketing activities*.

In such cases, we will process your personal data on the basis of your consent (art. 6.1.a) GDPR).

The consent may be withdrawn at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

3.9. Data analysis and segmentation to optimize and personalize our marketing activities

To optimize our marketing activities and to personalise communications, we may use procedures and systems for data analysis and segmentation.

For the above purposes, we will create a unified customer profile of you as the basis for our marketing activities, in particular to measure and understand the effectiveness of our advertising and communication as well as to provide you with highly relevant communication about our products and services tailored to your needs. To create such a customer profile, we combine your preferences and interests with information from your use of our products and services, like your interaction with online marketing and CRM campaigns, your online behaviour and your website and app usage and/or your vehicle data.

Once your data is unified for a complete customer profile, we will use this in our systems to conduct predictive scoring considering scientifically recognised mathematical and statistical procedures. Predictive scoring is the use of data, algorithms, and machine learning techniques to assign scores to various segments based on your data. These segments help us to easily visualise the key attributes and behaviours that drive our marketing activities. When your customer profile is dedicated to specific customer segments, we can control the type, content and frequency of our marketing activities to ensure you will receive communication that is highly relevant for you.

The significance and effects of our data analysis and segmentation are limited to the creation of target-groups for our marketing activities. This may result for you in receiving or not receiving certain communication unlike other customers.

3.10. Statistical analysis

We collect the information specified above for the purpose of statistical analysis and its' correlation with driving behaviour and accidents, with the purpose of better predictability of your risk profile and adaptation of our pricing quoting to you based on your driving behaviour.

[Drivers]

3.11. Management of the subscription

If you include any additional drivers, we will process their personal data in accordance with this policy. The scope of such processed data includes name and surname, address, contact data (email and telephone number), birth date and the driving licence.

In the above case we will process the data for the purpose of confirming the validity of a driving licence as well as compliance with other legal obligations and the requirements of our insurance providers.

The legal basis for processing of personal data is our legitimate interest related to compliance with the above requirements (art. 6.1 f) GDPR).

By providing the personal data of any person other than yourself, you confirm that you have been authorised by this person to share his/her personal data with us for the above purposes.

4. Responsibilities of FCA authorised entity

Services provided by us are treated as regulated activities under the law and are monitored by the Financial Conduct Authority (**FCA**). We are an appointed representative, solely in respect of the regulated consumer hire activity, of Product Partnership Limited (**PPL**). For any regulatory reporting obligations, including audits, we may share your name, surname, address, email, date of birth, details of the subscription (agreement) including number of payments, monthly payments, initial and final payment with PPL and the FCA (**Authorised entities**) which are authorised to receive this data.

Additionally, we are obliged to share any complaints you may have with the Authorised entities who support us with compliance services in accordance with the FSMA.

We process your personal data to comply with our legal obligations as our services are classified as consumer hire activities (art. 6.1.c) GDPR).

5. With whom is my data shared?

Your personal data may be transferred for the respective purposes to the recipients and categories of recipients listed below and processed by those recipients for the respective purposes:

(a) Members of Hyundai Group

- Hyundai Motor Europe GmbH, our affiliate, who provides the operations of support to HCM

Hyundai Connected Mobility is an appointed representative, in respect of consumer hire activity only, of Product Partnerships Limited which is authorised and regulated by the Financial Conduct Authority. Product Partnerships Limited FCA registration number is 626349 and its address is Second Floor, Atlas House, 31 King Street, Leeds LS1 2HL. Credit is subject to status, terms and conditions apply.

in relation to such services as finance and tax advice, legal and compliance and other administrative tasks, in its capacity as data processor;

- Hyundai Motor Company, our parent company, who provides us services related to enhanced data analysis for the purpose of customer segmentation and product improvement, in its capacity as data processor;
- Hyundai Autoever GmbH who provides some of our IT systems in its capacity as data processor.

(b) Providers of IT-related services, in particular in relation to the technology platform for Mocean service and supporting services

(c) Financial authorities (FCA) as well as with appointed representative Product Partnerships Limited

(d) Other partners involved in the provision of Mocean services

- Credit Scorers, for the purpose of creditworthiness check and fraud prevention, as described in clause 3.1.2;
- Partners offering document verification services;
- Our insurer and insurance broker partners in relation to the Mocean Subscription fleet, for the purpose of ensuring vehicle coverage by insurance;
- Financial services partner and providers of payment gateway services, for the purpose of enabling the proper functioning of the platform's payment system,
- Providers of services related to payments and invoicing in relation to the Mocean services;
- Third party managed contact centre and chat services;
- Debt collection and asset recovery partners;
- Logistics and home-delivery services partners;
- Third parties such as market research companies, marketing agencies and lead generation companies and well as other third parties who provide us with personal data;
- Our network of authorised Hyundai retailers and repairers for the purposes related to handover of the vehicle and providing repairs or other similar services to users of Mocean services.

(e) Governmental authorities and other similar third parties that are public bodies:

- Tax Authorities, Law Enforcement Agencies, Courts and Tribunals, as appropriate, based on compliance with legal obligations related to civil, penal, tax or administrative law.

6. Is my data transferred abroad?

0. We transfer your data outside the EU/ EEA to Hyundai entities located in the Republic of Korea, for the purposes indicated in chapter 5.
1. The European Commission has determined that Republic of Korea is among the jurisdictions that provide an adequate level of protection of personal data.
2. Other recipients of your personal data, in relation to purposes indicated in chapter 4, will be located or may have relevant operations outside of the UK and the EU/EEA, e.g. the United States of America, where the data protection laws may provide a different level of protection compared to the laws in the UK and for which an adequacy decision by the European Commission does not exist. With regard to data transfers to such recipients outside of the EU/EEA, we provide appropriate safeguards, in particular, by entering into data transfer agreements which include standard clauses adopted by the European Commission with the recipients, or by taking other measures to provide an adequate level of data protection. Where possible, we cooperate with partners who have adhered to the Data Privacy Framework program (DPF program) or have applied the Standard Contractual Clauses in the contractual relationship with us. The European Commission has determined that the United States ensure an adequate level of protection of personal data in relation to data transfer by companies participating in the DPF program.
3. A copy of the respective measures we have taken are available via Hyundai's data protection officer (see chapter 2 above).

7. How long will my data be stored?

0. Your personal data is stored by HCM and/or our service providers, strictly to the extent necessary for the performance of our obligations, and strictly for the time necessary to achieve the purposes for which the personal data is collected, in accordance with applicable data protection laws. When HCM no longer needs to process your personal data, we will erase it from our systems and/or records and/or take steps to properly anonymise it so that you can no longer be identified from the data (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).
1. In particular, your personal data related to the registration and provision of the Mocean services (section 3.0) will be kept for the duration of the contractual relationship. Subsequently, your personal data will be retained for up to 6 years (to provide for the statute of limitations period for legal actions as well as for purposes related to the requirements of tax and accounting law).
2. Your data collected in relation to the customer satisfaction surveys (section 3.4) will be stored for the period of 1 year following the end of the contractual relationship with us.
3. If you contact us via the contact centre or chat (section 3.5), the recordings from the contact centre and the content of your communication with us, containing your personal

data will be stored for a period of 3 years following the end of the contractual relationship with us.

8. Rights of the Data Subject:

What rights do I have and how can I exercise them?

If you have given your consent to the processing of your personal data, you can withdraw your consent at any time for future processing. Such a withdrawal will not affect the lawfulness of the processing prior to your withdrawal of consent.

Pursuant to applicable data protection laws, you have the following rights with respect to the processing of your personal data. Please note that these rights might be limited under the applicable national data protection laws.

0. **Right of access:** You have the right to obtain from us confirmation as to whether or not personal data concerning you is processed and, where that is the case, to request access to your personal data. This information includes – inter alia – the purposes of the processing, the categories of your personal data, and the recipients or categories of recipients to whom your personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access. You also have the right to obtain a copy of the personal data about you undergoing processing. For any further copies you might request, we may charge a reasonable fee based on administrative costs.
1. **Right to rectification:** You have the right to the rectification of any inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data updated, including by means of providing a supplementary statement.
2. **Right to erasure ("right to be forgotten"):** Under certain circumstances, you have the right to the erasure of your personal data and we may be obliged to erase your personal data.
3. **Right to restriction of processing:** Under certain circumstances, you have the right to have a restriction placed on the processing of your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.
4. **Right to data portability:** Under certain circumstances, you may have the right to obtain from us a copy of your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format. You have the right, without hindrance from us, to transfer this data or have it transferred directly by us to another entity.
5. **Right to object: Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to processing your personal data, and we will be required to no longer process your personal data. If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the**

extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

To exercise the above rights, please send a request to HCM.dataprotection@hyundai-europe.com.

6. **Right to complain:** You also have the right to make a complaint with the competent data protection supervisory authority.

9. Am I obligated to provide my data?

Fields marked with (*) for personal data in the forms presented to you are mandatory, and omitting any of them could result in us not being able to provide the services to you. Any other data are provided voluntarily.

To ensure that the provided information is always up-to-date and error-free, you must promptly communicate any modifications and rectifications of your personal data to HCM.

10. How can this Privacy Notice be changed?

We may change and/or supplement this Privacy Notice from time to time in the future. Such changes and/or supplements may be necessary in particular due to the implementation of new technologies or the introduction of new services or features. We will publish the changes on our websites and inform you accordingly.