



PORSCHE

Porsche Smart Mobility GmbH

General Privacy Policy

Porsche Digital Service Infrastructure / Porsche ID

We, Porsche Smart Mobility GmbH (hereinafter referred to as "we" or "PSM GmbH"), are pleased about your use of the Porsche Digital Service Infrastructure and other of our digital offers (hereinafter individually or jointly also referred to as "services" and jointly "Porsche Digital Service Infrastructure") and about your interest in our company and our products. Your privacy is important to us. We take protecting your personal data and handling this data confidentially very seriously. Processing of your personal data takes place exclusively within the scope of the statutory provisions of data protection and privacy law, particularly the EU General Data Protection Regulation (hereinafter "GDPR"). This Privacy Policy provides you with information on the processing of your personal data and your rights as a data subject within the scope of your use of our Services. For information on the individual Services, please see the Specific Privacy Policy and, where applicable, the further specific privacy notices pertaining to the relevant Service.

Where we link to this Privacy Policy from external social media sites, the terms and conditions that follow apply only to the extent that the data processing operations within the scope of such social media sites do in fact lie within our sphere of responsibility and no information that is more specific – and thus takes precedence – regarding data protection and privacy is provided within the scope of such social media sites.

1. Controller and data protection officer; contact

Unless expressly stated otherwise in this General Privacy Policy, a Specific Privacy Policy based on it or, where applicable, the further specific privacy notices pertaining to the specific Service, the controller responsible for data processing within the meaning of the laws on data protection and privacy is:

Porsche Smart Mobility GmbH
Porscheplatz 1
70435 Stuttgart
Germany
Email: smartmobility@de.porsche.com

Should you have questions or suggestions regarding data protection or privacy, please feel free to contact us.

You can reach our data protection officer as follows:

Porsche Smart Mobility GmbH
Data Protection Officer
Porscheplatz 1
70435 Stuttgart
Germany
Contact: dataprotectionofficer.smartmobility@porsche.com

2. Subject-matter of data protection

The subject-matter of data protection is the protection of personal data. This means all information concerning an identified or identifiable natural person (known as the "data subject"). This

includes information such as name, postal address, email address or phone number, as well as information that necessarily arises during the use of our Porsche Digital Service Infrastructure.

3. Nature, scope, purposes and legal bases of data processing in the case of the Porsche Digital Service Infrastructure

This General Privacy Policy provides you with an overview of the nature, scope, purposes and legal bases of the data processing within the scope of the registration, creation and use of your Porsche ID user account as well as the booking and use of our Services on the basis of your Porsche ID user account. You will also find in the text that follows information on data protection and privacy, such as on the recipients of personal data, data processing in third countries and your rights as a data subject, which applies in general within the scope of the use of the Porsche Digital Service Infrastructure. For more detailed information on the processing of personal data in relation to the use of individual Services, the relevant legal bases and specific rights of data subjects with regard to the relevant Service, please also see the relevant Specific Privacy Policy and, where applicable, the further specific privacy notices pertaining to the relevant Service.

4. Porsche ID user account

To use the Porsche Digital Service Infrastructure and the Services offered within it in full, it is necessary to register and create a Porsche ID user account in My Porsche. After completing the registration process and creating your Porsche ID user account you will also receive your Porsche ID (username for the Porsche ID user account). During registration and when creating and using your Porsche ID user account personal data is processed and may be transferred to third parties as depicted hereinafter in order to fulfil our contractual obligations in this context. Except where indicated otherwise, we carry out all processing operations described in this section in order to perform the contract existing between you and us on the basis of Article 6(1)(b) GDPR.

4.1 The registration process and creating your Porsche ID user account

You can choose one of two ways to register and create your Porsche ID user account:

4.1.1 Invitation by an authorised dealer

If you wish, your authorised dealer will enter the personal data you have provided for you via the dealer's access to our systems. You will then receive a link by email, for example, that you will have to use to confirm your registration and the creation of your Porsche ID user account. Please note that the authorised dealers are independent companies and we have no influence over them. A second factor will be used for additional verification, for example a code sent via text message that you then enter as part of the process of registering and creating your Porsche ID user account.

4.1.2 Self-registration

In the event that the registration and creation of your Porsche ID user account was not carried out via an authorised dealer, you can register and create your Porsche ID user account yourself and enter your personal data independently. In selected countries you can also add a vehicle and use other digital services that require vehicle ownership. You must also upload a copy of an identification document and proof of ownership and, in case you are not the owner of the vehicle, a power of attorney from the vehicle owner after entering your vehicle identification number. These documents are forwarded to Porsche Connect Support or, in countries whose official language is not supported by Porsche Connect Support, directly to the dealer selected by you and checked locally, using our verification criteria. As proof of successful verification, we also save the names, birth dates, birthplaces and addresses shown in the relevant identification documents along with the validity dates of the documents, as well as the vehicle identification numbers, owner names and addresses shown in the proof of ownership. After verification is complete, the copies of the documents will be deleted. If you add a vehicle and a specific vehicle is therefore assigned to you in your Porsche ID user account, a so-called vehicle relationship (hereinafter referred to as "vehicle relationship") exists. After successful verification, you will receive, for example, an e-mail with a link, which you must use to confirm your registration and creation of your Porsche ID user account. A second feature allows you to additionally verify your identity, for example via an SMS code, which you then enter during the process of registering and creating your Porsche ID user account.

Self-registration requires that you upload pictures from your device. This means you will be asked for authorisation to access your device's camera or photo library. Granting authorisation is voluntary. However, if you wish to use the self-registration feature, granting the relevant authorisation is required, as you will be unable to use self-registration otherwise. The authorisation remains active until you reset it in your device and/or internet browser by deactivating the relevant setting.

(a) Required information when registering and creating your Porsche ID user account

When registering and creating your Porsche ID user account you are required (in the case of self-registration) to enter your email address, a password, your name and any suffixes, contact and address information, mobile phone number, email address and, where applicable, the language in which you wish to communicate with us, or (in the case of registration and creation of your Porsche ID user account via an authorised dealer) to confirm this personal data during the process of registering and creating your Porsche ID user account. This personal data is required in order to set up and manage your Porsche ID user account for you so that you can use the full range of our Services offered within the scope of the Porsche Digital Service Infrastructure. In selected countries, you can also use our offerings as a prospective customer. In this case all you are required to provide is your name and email address and a password. We also need this and, where applicable, further personal data not least in order to be able to respond to requests, questions and criticism. In addition we store the time of your most recent log-in. During registration and creation of your Porsche ID user account we perform a plausibility check of your name and address information.

(b) Voluntary information when registering and creating your Porsche ID user account

When registering and creating your Porsche ID user account you also have the option to voluntarily enter further information, such as additional name information (academic titles, etc.), company contact information, date of birth, other phone numbers, credit card information (which is stored exclusively with the payment service provider) and your vehicle registration number and a personal vehicle name. In addition you can provide information on your

interests and preferences and your desired contact channels. Please note that this information is not required in order to register and create your Porsche ID user account, and it is entirely up to you whether you wish to communicate this personal data to us.

4.2 Porsche Digital Service Infrastructure: Data processing after registration and creation of your Porsche ID user account

If you have registered and created your Porsche ID user account we will share fundamental information regarding your Porsche ID user account and your vehicles with Porsche dealers that provide service in order to be able to provide you with service via our dealer organisation as well, as needed. This is done in order to perform the contract with you on the basis of Article 6(1)(b) GDPR. To this end, we will transfer not only your vehicle identification number, but also your username (Porsche ID), the technical and/or sales-related availability of Services and product offerings for your Porsche ID user account or vehicle and relevant events within the scope of the creation, modification or deletion of your Porsche ID user account, links to vehicles, the selection of dealers or the activation or deactivation of Services.

If you have selected an authorised dealer and granted your consent, the personal data stored in your Porsche ID user account, particularly contact information, customer service, contract and Service information and information on your interests, vehicles and Services used, will also be shared with the authorised dealer and synchronised with any personal data concerning you that may be stored by the authorised dealer. If you no longer wish this sharing of data to take place in the future, you can adjust the user settings for your Porsche ID user account accordingly. The aforementioned personal data will no longer be shared with the authorised dealer from then on. The legal basis for the processing of your personal data in this context is your consent pursuant to Article 6(1)(a) GDPR.

4.3 Deleting your Porsche ID user account

If you delete your Porsche ID user account, the personal data stored in your Porsche ID user account will also be erased upon termination of the contractual relationship, but not before the end of the term of your existing Service licences. To the extent that personal data must be stored for legal reasons, this data will be blocked (this is known as "restriction of processing"). The personal data is then no longer available for further use, particularly for the use of Services. The Services may no longer function in full or at all as a result. You will then no longer be able to use the Porsche Digital Service Infrastructure in full either. If further controllers within the Porsche group of companies and its sales organisation process personal data on their own responsibility, the processing of this personal data will not be affected by this. To the extent that personal data has been shared with a dealer of your choice based on your consent pursuant to Article 6(1)(a) GDPR, we will notify the dealer of the deletion of your Porsche ID user account.

5. Central Services

5.1 Booking and activation of Services; handling of payment information

You can book individual or multiple My Porsche Services and Porsche Connect Services and activate Service licences. When selecting the relevant Service or Service package you can also view the relevant information included in the offer details on the processing of personal data within the scope of the Services in question. To perform and fulfil a booking and the contractual relationship associated with it we process not only the relevant booking information, but also your personal data that has been collected during the process of registering and creating your Porsche ID user account. You can change your billing address before the booking process is concluded. In this case we will use this address information that you provide for purposes of billing and settling the account.

We use a payment service provider to process payments for our paid services and products within the framework of My Porsche, Porsche Connect, Online Marketplace and Porsche Drive Rental. For this purpose, we and the payment service provider used will process your credit card information and the respective payment information. The payment service provider's systems are used to manage your credit card information and to process payments. When you enter your credit card information, this is done directly via an input field of the payment service provider, which encrypts, stores and uses this information independently for your payments. The encrypted information is then transferred from Porsche/from us to the payment service provider where it is stored and used for your payment. The applicable legal basis for this processing of your personal data in order to process payment is the fulfilment of the contract pursuant to article 6 paragraph 1 b) of the GDPR.

The payment service provider commissioned will process your customer and contact information (for example name, address, email address, Porsche Connect customer number, and if applicable, company and affiliates) and the vehicle identification number shown in the proof of ownership exclusively for the purpose of debtor management (including compliance checks, where legally required) and to carry out credit checks. The legal basis for processing the named personal data for the aforementioned purposes, in accordance with article 6 paragraph 1 c) of the GDPR, is the fulfilment of a legal obligation incumbent on us and, in accordance with article 6 paragraph 1 f) of the GDPR, our legitimate interest in appropriate accounts receivable management and credit controls, provided we are not subject to any legal obligation.

When purchasing through online shops, our payment service provider determines the fraud risk. The transaction data is checked and examined for abnormalities (e.g. frequency of password changes). The legal basis for the processing of the mentioned personal data for the aforementioned purposes is, in accordance with GDPR Article 6 [1] (b), the fulfilment of a contract, or, pursuant to GDPR Article 6 [1] (f), our legitimate interest in preventing fraud.

After the booking is complete, you can activate the Services. This will store your use authorisation in the system and cause the list of available Services to be updated accordingly.

In order to use certain services (e.g. E-Charging station offers), a personalised card (referred to as a Porsche ID Card or Porsche Charging Card) containing RFID chips is sent by post in many countries when a product is purchased. An identification number is stored on the card, which can be used to assign it to your Porsche ID user account. No personal data beyond the identification number, in particular your name or address, is stored digitally on the card itself. If the card is lost, you can block it within your Porsche ID user account.

Once delivered, the Porsche ID Card can be used directly in dealings with supported infrastructure (such as public charging stations).

Unless otherwise indicated, we carry out the processing operations described in this section in order to perform our contract with you on the basis of Article 6(1)(b) GDPR.

5.2 Use of the My Porsche Services and Porsche Connect Services

You can use the My Porsche Services and Porsche Connect Services that have been booked, depending on the Service, in your vehicle (to the extent available for your vehicle) via mobile connection or via further devices in My Porsche or your Porsche Connect app and, where applicable, also from multiple or all access points. To this end, your vehicle or the relevant device will connect to the Porsche Digital Service Infrastructure.

When you use the Services booked via My Porsche or the Porsche Connect Store in your vehicle or on other devices, we process

personal data concerning you for the purposes of enabling the use of the Services, for support purposes and for further, specifically defined purposes. Unless otherwise indicated, we process your personal data only within the scope necessary to enable the use of the relevant My Porsche Service or Porsche Connect Service.

When you use the individual My Porsche Services or Porsche Connect Services the following categories of personal data may be processed, for example, depending on how the specific Service works:

- a) identification information, such as the vehicle identification number, your Porsche ID and the device and system IDs for your devices and mobile radio modules, which is needed to identify you personally, your device or your vehicle in order to establish connections, use Services or access content;
- b) authorisation information, including that the vehicle or the relevant device has been activated for the relevant Porsche Connect Service, which can be linked to your personal data that you entered during the process of registering and creating your Porsche ID user account;
- c) login information that is needed if you wish to use services from other providers that require a login in your vehicle or on other devices;
- d) communication information that is required in order to establish a connection between your vehicle and/or other devices and our servers or the servers of third-party providers of content for Porsche Connect Services;
- e) location and movement information, such as GPS or speed data, that is needed in order to use location-based content;
- f) language information that enables voice control and voice entries in certain Porsche Connect Services. Voice data is transferred to us from the vehicle or a device as recordings for the purpose of conversion to text. The text that is then generated by a service provider is transferred back to the vehicle and the recording is then deleted at our end;
- g) contact information that is used in communication services, for example to send email or text messages;
- h) billing data, such as individual connection records regarding charging processes. We may combine this information with your address and payment information for individual billing purposes;
- i) image/video data of your vehicle or its components
- j) further content that must be shared with us or with service providers in order to be able to provide a Service for you.

For detailed information on which personal data is processed within the scope of which Service, please see the relevant Service descriptions at <https://connect-store.porsche.com/ie/en/>.

The following applies especially in the context of workshop visits and the associated use of online order extension:

Online order extension is a service that offers our customers the possibility to follow the vehicle acceptance process during a workshop appointment at any time and from anywhere through recorded and personalised videos of the service consultant and/or technician. In addition, the customer can release/approve additional repairs/repair extensions directly via the My Porsche Portal and/or the My Porsche App.

Unless otherwise mentioned here, in one of the Specific Privacy Policies or, where applicable, in the further specific privacy notices pertaining to the relevant Service, we process your personal data in each case on the basis of Article 6(1)(b) GDPR in order to provide you with the Services in this context and perform the contract associated therewith.

5.3 Use of services of a third-party provider

If you use services provided by a third-party provider with which you have a contractual relationship of your own, content of these services may be displayed in your vehicle or on your device and information may be shared between your vehicle or device and the service provider in question.

We have no influence over the processing of data by this third-party provider or the location of the data processing. Therefore please see the relevant third-party provider's separate privacy notices for information on the nature, scope and purpose of the processing of personal data with regard to the relevant service.

We transfer the necessary personal data to the relevant third-party provider on the basis of Article 6(1)(b) GDPR to perform the contract existing between you and us.

5.4 Porsche Contact Centre

You can use various communication channels to contact us, in particular the service hotline if you wish to contact us by telephone, but also e-mail or live chat. When you contact our Contact Centre, we will process your personal data insofar as this is necessary in order to provide the Contact Centre service and to process your request. It is possible that we may ask you to provide personal data that is required to prepare and organise contact in order to process your specific request. Without this data, we will not be able to process your inquiry or accede to your request. The purposes of processing arise specifically from your inquiry and the services you have booked. They cover in particular

- The processing of inquiries from interested parties, customers and dealers in relation to products and services from Porsche Smart Mobility GmbH. These include, for example
- Technical support services
- Assistance when purchasing services or products
- Answering general questions about Smart Mobility
- Technical support for customers and dealers, in particular through the provision of a service hotline for telephone contact.

Data is processed on the basis of article 6 paragraph 1 b) of the GDPR for the purpose of fulfilling the contract with you and implementing measures in advance of the contract.

We also process your personal data to comply with legal obligations to which we are subject. Obligations may arise, for example, from commercial, tax, telecommunications, money laundering, financial or criminal law. The purposes of processing arise from the respective statutory obligation; the processing generally serves the purpose of complying with state obligations with regard to monitoring and duty of disclosure.

Data is processed on the basis of article 6 paragraph 1 c) and e) of the GDPR. If we collect data on the basis of a legal obligation or in the public interest, you need to provide the personal data that is required to comply with the legal obligation. Without this, we might not be able to process your request or fulfil these obligations.

If you use support services in a Porsche Centre, your dealer can also retrieve this data. To facilitate this service, we also transmit the aforementioned data to the relevant dealer. In this case, we will process your personal data in accordance with article 6 paragraph 1 f) of the GDPR on the basis of our legitimate interest in facilitating customer service at your preferred point of contact or through your preferred dealer.

6. Safeguarding legitimate interests

To the extent that we process your personal data to safeguard our legitimate interests, this takes place in addition to the data processing operations and purposes described in this General Privacy Policy, the Specific Privacy Policies or, where applicable, the further specific privacy notices pertaining to the relevant

Service within the scope of the specific Service particularly against the background of the following interests:

1. further development of products, services and customer service offerings as well as other measures to manage business transactions and processes;
2. improvement of product quality, elimination of errors and disruptions, including by means of analysis of vehicle data and customer feedback;
3. processing of data in a central prospective customer and customer care platform as well as upstream and downstream systems for customer loyalty and sales purposes to provide individual care to customers and prospective customers;
4. handling of warranty and service cases, processing of inquiries and other requests submitted by prospective customers and customers outside of contracts;
5. analysis of demand and customer segmentation, e.g. calculation and evaluation of affinities, preferences and customer potential;
6. risk management and coordination of recall campaigns;
7. credit checks, by means of sharing data with credit bureaus (e.g. SCHUFA);
8. ensuring legal compliance, preventing and protecting against legal violations (especially criminal acts), assertion of and defending against legal claims;
9. ensuring the availability, operation and security of technical systems and technical data management.

The relevant data processing takes place on the basis of Article 6(1)(f) GDPR in this regard.

7. Consent

Should you grant us consent to certain data processing operations, this consent is always associated with a specific purpose; the purposes arise in each case from the content of the specific declaration of consent. In this case, the processing of data takes place on the basis of Article 6(1)(a) GDPR. If you do not consent, we are not able to comply with your request that is covered by the consent. You can withdraw consent, once granted, at any time without this affecting the lawfulness of processing that has taken place based on consent before its withdrawal.

On the basis of any consent that may have been granted by you, the companies listed in the declaration of consent may use the data for specific purposes, e.g. to provide individual care for customers and prospective customers, and may contact you via your desired communication channels.

If we use your data to provide individual care for customers and prospective customers within this scope, this takes place in order to provide you with an exciting brand and customer care experience with Porsche and to make our communications and interactions with you as personal and relevant as possible. Which of your data is specifically used to provide individual care for customers and prospective customers depends in particular on which data has been collected on the basis of inquiries, orders and advising (e.g. when purchasing Porsche products) and which data (e.g. your personal interests) you have provided at the relevant contact points (e.g. via this website or at the Porsche Zentrum).

In these cases, the specific scope and intended purpose of the consent granted by you arise from the wording of the declaration of consent at the point of contact.

8. Recipients of personal data

Internal recipients: Within PSM GmbH access is restricted to those persons who require it for the specific purposes mentioned.

External recipients: We do not disclose your personal data to external recipients outside PSM GmbH except where necessary in order to provide and carry out the relevant Service, where there is

another legal authorisation or where we have your consent to do so.

External recipients may be the following:

a) Processors:

Dr. Ing. h.c. F. Porsche AG or its affiliates or external service providers with which we contract for the provision of services, for example in the areas of technical infrastructure and service/maintenance for the offerings of PSM GmbH or the provision of content. We select these processors carefully and subject them to regular reviews to ensure that your privacy is safeguarded. The service providers are not permitted to use the personal data other than for the purposes specified by us and according to our instructions.

b) Public bodies:

Government agencies and state institutions, such as tax authorities, public prosecutors' offices or courts, to which we transfer (and/or are required to transfer) personal data for mandatory legal reasons or to safeguard legitimate interests. In these cases the transfer takes place on the basis of point(s) (c) and/or (f) of Article 6(1) GDPR.

c) Private bodies

Porsche dealers and service businesses, cooperation partners, service providers or persons to which or whom personal data is transferred on the basis of consent, to perform a contract with you or to safeguard legitimate interests, such as Porsche centres and Porsche service centres, financing banks, providers of further services or transportation service providers. In these cases the transfer takes place on the basis of point(s) (a), (b) and/or (f) of Article 6(1) GDPR.

9. Data processing in third countries

If data is transferred to bodies whose headquarters or place of data processing is not located in a member state of the European Union, another country outside of the European Union that is a signatory to the Agreement on the European Economic Area or a state for which an appropriate level of data protection has been determined through a decision of the European Commission, we will ensure before disclosure that the data transfer is either covered by a legal authorisation, that there are guarantees for an adequate level of data protection with regard to the data transfer (e.g. through the agreement of contractual warranties, officially recognised regulations or binding internal data protection regulations at the recipient) or that you have given your consent to the data transfer.

Insofar as data is transferred on the basis of GDPR Article 46, 47 or 49, Paragraph 1, Subparagraph 2, you can obtain from us a copy of the guarantees for the existence of an adequate level of data protection with regard to the data transfer. For this purpose, please use the information under point 1.

10. Collection of data by third parties

We do not only process personal data that we receive from you directly. We also receive some personal data from third parties to the extent that we have a legal basis for this.

For details regarding collection of data by third parties, please see the Specific Privacy Policies and, where applicable, the further specific privacy notices pertaining to the relevant Service.

11. Automated decision-making and profiling

We do not use any automated decision-making pursuant to Article 22 GDPR to prepare for, establish and/or carry out business relationships. To the extent that profiling is performed, this takes place only for the purposes mentioned within the scope of the

General Privacy Policy, the Specific Privacy Policies and, where applicable, the further specific privacy notices pertaining to the relevant Service and on the basis of the legal bases mentioned.

12. Duration of storage; erasure

Except where information on the specific duration of the storage and/or erasure of personal data is provided in the description of the specific Services, the following applies:

We store your personal data only as long as is necessary to fulfil the intended purposes or – in the case of consent – unless and until you withdraw consent. In the event of an objection to processing, we erase your personal data unless the continued processing thereof is permitted pursuant to the relevant statutory provisions. We also erase your personal data if we are obligated to do so for other statutory reasons.

Applying these general principles, we generally erase your personal data without delay

- after the legal basis ceases to apply, provided that there is no other legal basis (e.g. storage periods mandated by commercial and tax law) that applies. If the latter is the case, we erase the personal data after the other legal basis ceases to apply.
- if it is no longer needed for our purposes of preparing for and performing a contract or pursuing legitimate interests and there is no other legal basis (e.g. storage periods mandated by commercial and tax law) that applies. If the latter is the case, we erase the personal data after the other legal basis ceases to apply.
- if the purpose for which we have collected it ceases to apply and there is no other legal basis (e.g. storage periods mandated by commercial and tax law) that applies. If the latter is the case, we erase the personal data after the other legal basis ceases to apply.

13. Rights of data subjects

As the data subject affected by data processing, you have numerous rights at your disposal. Specifically:

Right of access: You have the right to obtain information regarding the personal data concerning you that is stored by us.

Right of rectification and erasure: You can request that we rectify incorrect data and – provided that the statutory prerequisites are met – erase your data.

Restriction of processing: You can request – provided that the statutory prerequisites are met – that we restrict the processing of your data.

Data portability: Should you have provided data to us on the basis of a contract or consent, you can, if the statutory prerequisites are met, request that you receive the data provided by you in a structured, commonly used and machine-readable format or that we transfer it to another controller.

Objection to data processing in the case of “legitimate interest” as the legal basis: You have the right to object, on grounds relating to your particular situation, at any time to the processing of data by us to the extent that this processing has “legitimate interest” as its legal basis. If you exercise your right to object, we will discontinue the processing of your data unless we can demonstrate – in accordance with the statutory specifications – compelling legitimate grounds for continued processing which override your rights.

Withdrawal of consent: To the extent that you have granted us consent to the processing of your data, you can withdraw

it at any time with effect for the future. This does not affect the lawfulness of the processing of your data prior to the withdrawal of consent.

Right to lodge a complaint with the supervisory authority: You can also lodge a complaint with the competent supervisory authority if you believe that the processing of your data violates applicable law. To this end, you can contact the data protection supervisory authority with jurisdiction over your place of residence or your country or the data protection supervisory authority with jurisdiction over us.

Contacting us: You can also contact us free of charge with any questions regarding the processing of your personal data, your data subject rights and any consent you may have given us. To exercise all your aforementioned rights, please contact us by e-mail at dataprotectionofficer.smartmobility@porsche.com, via the website <http://www.porsche.com/specials/en/uk/psm-privacy-contact> or by post at the address indicated in Point 1 above. When doing so, please make sure that we can clearly identify you.

14. Data security

We utilise all the necessary technical and organisational measures in keeping with the state of the art in order to ensure a level of security appropriate to the risk, in accordance with the applicable statutory requirements.

15. Third-party offerings

Services of other providers linked to by our Services have been and are designed and provided by third parties. We have no influence over the design, content and/or functioning of these services. We expressly distance ourselves from all content of all services linked to. Please note that these services, such as third-party websites, may install cookies on your device or collect personal data. We have no influence over this. In this regard, please obtain information directly from the providers of these services linked to as necessary.

16. Version

The most current version of this Privacy Policy applies.

Last updated: 01.06.2021

Specific Privacy Policy

Porsche Smart Mobility Websites

You can use My Porsche, Porsche Connect Store, Online Marketplace and Porsche Drive Rental via our website (hereinafter also referred to as "website").

You can book My Porsche services, Porsche Connect services and Functions on Demand (FoD) and activate the corresponding licences in My Porsche and the Porsche Connect Store. You can rent vehicles under Porsche Drive Rental. This requires you to be registered with My Porsche and have a Porsche ID user account. Depending on the service, you can use and manage the aforementioned services via our website, via various Porsche apps and, if available for your vehicle, in your vehicle via wireless network connection.

In addition, you can use the Online Marketplace to access the extended range of products and services offered by our Group companies and third-party providers. Customers with a Porsche ID user account can use the Marketplace sections Porsche Finder and Porsche Store.

Some features on our websites are also available without registration. For further details see Point 2.3.

1. Special notes on the use of our website

1.1 Provision of our website

To a certain extent, it is possible to use this website without registration. Even if you use the website without registration, personal data may still be processed.

Below you will find an overview of the type, scope, purposes of and legal grounds for automated data processing that takes place when using our website. For information on the processing of personal data when using the individual specific features and services, please refer to Point 2 below.

1.1.1 Automated data collection

The following data will be processed by us when you access our website with your device:

- Date and time of access,
- Duration of visit,
- Type of device,
- Operating system used,
- The features you use,
- Amount of data transmitted,
- Type of event,
- IP address,
- Referrer URL,
- Domain name.

We process this data on the basis of GDPR Article 6 [1] (f) for the purpose of providing the website, safeguarding its technical operation and identifying and clearing up malfunctions. In doing so, we pursue the interest of making it possible for our website to be used and ensuring its long-term technical functionality. When you access our website, this data will be processed automatically. You will not be able to use our website without providing this data. We do not use this data for the purpose of drawing conclusions about you or your identity.

1.1.2 Data processing to improve our online offer

The automated data we collect mentioned in Point 1.1.1 is furthermore processed to improve the performance of our services, to ensure their availability, to optimise the user experience, to further evaluate your use of the website, to compile reports on website activities for us, and to provide other services related to website usage.

We shall process your data in accordance with GDPR Article 6 [1] (f) based on our legitimate interest in the performance and availability of our products, as well as in the analysis of the usage patterns of our website visitors. We do not use this data for the purpose of drawing conclusions about you or your identity.

In addition, we store cookies as part of the processing described here. For further details, please refer to Point 1.1.3.

1.1.3 Cookies and comparable technologies

Within the context of our online content, we use cookies and comparable technologies, which enable us to record and evaluate its use. This ensures the proper and secure operation of the online content and its functionalities. Data processing takes place on the basis of GDPR Article 6, Paragraph 1 (b) and (f), as this is necessary for implementation of the functions that you select and in order to safeguard our legitimate interest in the functionality of our online content.

In addition, we may also use cookies and comparable technologies in order to analyse the online content and specifically align it to your interests and, if necessary, to provide you with interest-based content and advertisements. Appropriate cookies are sometimes set by third parties, who may merge the information obtained with other data. This enables us to target users of the online content in their use of other content with interest-oriented advertising, with the help of selected partners (retargeting/remarketing). The data thus collected will not be used by us to identify you personally and will at no time be merged with the personal data stored by us. Data processing takes place exclusively on the basis of your voluntary consent in accordance with GDPR Article 6, Paragraph 1 (a). Optionally, you can extend your consent to either individual cookies or all cookies in this category. You can revoke your consent at any time with effect for the future.

Details regarding the function and the cookies and comparable technologies used as well as setting and revocation options, can be found under **Cookie settings** (<https://connect-store2.porsche.com/ie/en/cookiepolicy>). If you do not wish to use cookies, you can also prevent any storage by means of the relevant settings on your device. Stored cookies can be erased at any time using the system settings of your device. Please note that blocking certain types of cookies or comparable technologies may result in impaired use of our online content.

1.2 Device access permissions

When using individual features such as "Closest Porsche Drive Rental location", you may be asked to grant access to your location.

Granting permissions is voluntary. However, if you wish to use the relevant features, you must grant the corresponding permissions, otherwise you will not be able to use these features.

Permissions remain active unless you revoke them in your device and/or Internet browser by deactivating the relevant setting.

2. Special services and features

You can voluntarily provide personal information or register for services or features when using our website. When registering and using the services and features described below, personal data will be collected, processed and used by us as shown below.

It is necessary to register in advance and to create a Porsche ID user account in order to use the services and features described in Point 2.2. The services and features described in Point 2.3 can be used without prior registration.

2.1 Registration process and creation of a Porsche ID user account

Information on the registration process and the creation of your Porsche ID user account can be found in Point 4.1 of the Porsche Digital Service Infrastructure / Porsche ID General Privacy Policy.

2.2 Using the individual features with registration/login

The features within the framework of our offering on our website and the relevant processed personal data, purposes and legal bases are described below.

2.2.1 Booking and activating services, handling payment information, identity verification

For information about how to book services via our website and how payment information is handled, see Point 5.1 of the Porsche Digital Service Infrastructure / Porsche ID General Privacy Policy.

The laws in some countries may require an identity check based on identification documents in order to book certain telecommunications services. In relation to data processing when carrying out such identity checks, we are jointly responsible with

- IDnow GmbH, Auenstr. 100, 80469 Munich, Germany.

You can access the Privacy Policy of our cooperation partner IDnow GmbH via <https://idnow.io/privacy/>.

There are two methods available for performing identity verification. One method is that you can be redirected to the external page or app of the service provider, IDnow, as part of the service booking procedure. As part of the process, we will, at your request, transmit the information to be verified (your name, your address and your date of birth) as well as a reference number to the service provider that will allow us to assign the test result at a later point. As part of the identity check, the service provider will compare the aforementioned data with your identification document and store the data, as well as an optoelectronic copy of the identification document, a photo of the verified person and an audio record of the session. The service provider will then inform us of the result of the identity check, using the reference number.

Your other option is to have identity verification performed at a participating Porsche Centre. This involves staff at the Porsche Centre verifying your identity on the basis of an identification document and sending the verified information (your name, address and date of birth) and a reference number to the service provider via a Porsche system. By entering this reference number, you can use the service provider's app to submit an optoelectronic copy of your identification document to the service provider at your convenience. The service provider will then inform us of the result of the identity check, using the reference number.

Personal data resulting from this identity check will only be shared with third parties if we are legally obliged to do so. Only in such cases will we obtain access to a copy of your identification

document from the service provider, for the purpose of fulfilling our legal obligations.

The legal basis for our processing of your personal data in order to carry out an identity check is GDPR Article 6 [1] (c) and/or (f), as the identity check is the fulfilment of a legal obligation by which we are bound, or reflects to our legitimate interest in complying with legal requirements.

As the jointly responsible party together with IDnow GmbH, we have determined in an agreement according to GDPR Article 26 how the respective functions and relationships in the processing of personal data are to be structured and who is to satisfy which data protection obligations, in particular with regard to ensuring an adequate level of security, the implementation of your rights as a data subject, the fulfilment of data protection obligations, as well as the monitoring of potential data protection incidents, including the assurance of reporting or notification obligations (as required). You can use the contact details provided in Point 1 (of the General Privacy Policy) to request further information about this agreement; we shall then supply you with the key provisions.

You are welcome to contact either of the jointly responsible parties with questions or to exercise your rights as a data subject. In the spirit of the aforementioned agreement, we will consult with IDnow GmbH in accordance with GDPR Article 26 in order to answer your inquiry and, if necessary, to fulfil your wish to exercise your rights as a data subject.

The exchange of personal data between the jointly responsible parties takes place on the basis of GDPR Article 6 (1) (f), in other words our legitimate interest in the effective implementation of identity checks in cooperation with IDnow GmbH.

If necessary, we supply further information about the processing of personal data for our bookable services in the additional special data protection provisions for the relevant services.

2.2.2 Using the My Porsche services and Porsche Connect services

Information on the use of My Porsche services and Porsche Connect services via our website can be found in Point 5.2 of the Porsche Digital Service Infrastructure / Porsche ID General Privacy Policy.

2.2.3 Provision of service and warranty information

Prior registration and creation of a Porsche ID user account is required to use this feature.

In order to provide you with information about your vehicle, current warranties and recall campaigns in the "My Porsche" section of our website, we process equipment and vehicle master data such as the vehicle identification number shown on the proof of ownership, current warranties, the model year and a model picture.

Pursuant to GDPR Article 6 [1] (b), the legal basis for the processing of your personal data is the fulfilment of the contract between you and us.

2.2.4 Service appointment request

Prior registration and creation of a Porsche ID user account are required to use this feature.

To request service appointments with Porsche dealers and service companies in the "My Porsche" section of our website and app, we may provide customer and vehicle data to companies of your choice at your request. If you wish, we will provide your name, address, telephone number, e-mail address, Porsche ID, vehicle identification number shown in the proof of ownership, vehicle model, the service dates you have selected, the scope of service

you desire, and a supplementary message to your request, as well as the desired contact channels for the dealer or service company chosen by you for the relevant request (the dealer or service company that will be carrying out the work).

The transmission of your personal data takes place within the framework of the respective service request on the legal basis of GDPR Article 6(1) (b) as a precontractual measure at your request. We store your respective service request in order to fulfil the contract between you and us in accordance with GDPR Article 6(1) (b).

2.2.5 My Porsche News

The My Porsche News feature lets you call up news in the app as well as via the My Porsche portal. This usually entails information relevant to the contract in connection with the purchase and/or the use of your account, your vehicle or digital content from Porsche.

We process the following personal data in particular for this: master data, contact details, contract data, dealer data and vehicle data. We process the above personal data on the legal basis of GDPR Article 6(1) (b) to fulfil our contract with you to provide the app and its features, as well as on the basis of the legal basis of GDPR Article 6(1) (f) to fulfil our justified interest in providing services in connection with your contract.

2.2.6 Collection of vehicle, service and product data for product and service development and improvement

In connection with the use of services, in the event of error messages or as part of defined data evaluation measures, certain vehicle, service and product data from the vehicle, from services or from other Porsche products may be transferred by Porsche Smart Mobility GmbH to Porsche AG in order to be available there for evaluation of the aforementioned purposes.

You can consent to this on the "My Porsche" website.

The vehicle, service and product data comprise identification, basic, usage, analysis, environmental, traffic, location and movement data.

Some data cannot be deleted retroactively, as they are stored without concrete vehicle identification. In this case the data will be deleted after 5 years at the latest.

2.2.7 Reservation and purchase of services and products via the "Online Marketplace" section

As part of the Online Marketplace, we offer you a central platform where you can book or purchase services and products from us, our group companies and third-party providers (hereinafter also referred to as "participants"). The respective participant is provided with an area on our platform to present and offer their products and services (hereinafter referred to as "shop").

Customers with a Porsche ID user account can use the "Marketplace" sections "Porsche Finder" and "Porsche Store". Customers without an existing Porsche ID contract can also use the Marketplace section "Porsche Store" via the "Guest access" feature.

Processing within the framework of the Online Marketplace is carried out partly by us, partly by the respective participant and partly under joint responsibility.

2.2.7.1 Processing under the responsibility of PSM GmbH

For information on data processing carried out by us under our sole responsibility, please refer to the other chapters of this and other privacy policies of Smart Mobility GmbH.

2.2.7.2 Processing under the responsibility of Marketplace participants

For information on data processing carried out by Marketplace participants under their sole responsibility, please refer to the privacy policies of the respective companies. The responsible participant is indicated on the respective page of the product or service.

2.2.7.3 Processing under joint responsibility of PSM GmbH and Marketplace participants

With regard to the following processing, we are jointly responsible with the respective participants of the Online Marketplace who have placed the offer on the respective page and with whom you may book services or products:

- Data processing as part of the visit and the booking, application or reservation process in the respective shop of the Marketplace participant, but not the downstream service processing outside the platform;
- Automated data collection, data processing to improve our online service, storage of cookies and data analysis (see Point 1.1 of this Privacy Policy);
- Data processing within the scope of advertising, communication and marketing features of the platform, especially cross-selling modules;
- Payment processing for paid bookings, applications and reservations within the framework of the respective shop of the Online Marketplace;
- Customer support with regard to the respective shop in the Marketplace.

In relation to these data processing activities, we determine the purposes and means of processing personal data in cooperation with the respective Marketplace participants.

In an agreement with the relevant Marketplace participants on joint responsibility, we have defined, pursuant to GDPR Article 26, the respective tasks and responsibilities in the processing of personal data and the responsible parties to fulfil data protection obligations. In particular, we have defined how an appropriate level of security and your rights as a data subject can be ensured, how we can jointly comply with data protection information obligations and how we can monitor potential data protection incidents. This also includes ensuring that we can fulfil our reporting and notification obligations.

PSM GmbH is at your disposal as your central point of contact with regard to the aforementioned processing in joint responsibility. You can assert your rights in relation to processing operations under joint responsibility but also vis-à-vis a jointly responsible Marketplace participant. Insofar as you contact us in relation to these processing operations, we will consult with the relevant Marketplace participant in accordance with the aforementioned agreement under GDPR Article 26 in order to answer your enquiry and to guarantee your data subject rights. In this case, the statements in Section 13 of the General Privacy Policy apply.

This joint responsibility does not affect, in particular, the processing operations mentioned in the General Privacy Policy, including those for master data administration (Porsche ID) and data processing on the platform, which are carried out under the sole responsibility of Porsche Smart Mobility GmbH. In particular, the service processing of the purchase, booking, application or reservation contract as well as invoicing does not take place under joint responsibility, but under the sole responsibility of the relevant Marketplace provider.

2.2.8 Formation and processing of the rental agreement within the framework of Porsche Drive Rental

This feature enables you to rent a Porsche vehicle.

In order to conclude a rental contract, you must provide us with the personal data listed below. You can save this personal data in your Porsche ID user account at any time, thus speeding up processing at the rental location. If you do not save this personal data in your Porsche ID user account in advance, you will be required to provide this personal data by completing this personal data in your Porsche ID user account at the rental location (possibly by our service provider). An appropriate device will be made available to you at the location for this purpose if necessary.

In order for a valid rental contract to be created, the following mandatory data must be saved in your Porsche ID user account:

- Gender,
- First and last name,
- Date of birth,
- Nationality,
- E-mail address,
- Mobile phone number,
- Address (street and house number, postcode and town/city),
- Payment details for the rental charge (name, credit card number, issuing institution, card security code),
- Details of the driving licence (licence number, date and place of issue),
- Details of the ID card (ID number, date and place of issue),
- Payment details for the security deposit (name, credit card number, issuing institution, card security code).

If this data is not provided, it is not possible to draw up a rental contract and the vehicle cannot be collected.

We shall process the gathered data on the basis of GDPR Article 6 [1] (b) and (f) in order to provide you with the services you require in this connection, and to implement the associated contractual relationship with you.

In order to establish your identity before you sign the rental contract, you will be asked by our service provider to identify yourself. In addition, to ensure the correctness of the data (for example no typographical errors, reversal of first and last name, the spelling of foreign street names and house numbers, etc.) and for security reasons (for example disclosure of the card number to the competent authorities in the event of a criminal offense or misdemeanour relating to the rented vehicle) a copy is generally made of your ID card. Unnecessary information (such as your height or eye colour) will be blacked out. Your personal data will be processed on the basis of GDPR Article 6 [1] (b), (c) and (f) in order to provide you with the services you require in this connection, to implement the associated contractual relationship with you and to meet our legal obligations. Our legitimate interest derives from the purposes set out at the beginning of this paragraph.

We do not process any payment data on this website. Billing uses your Porsche ID user account. For more information on the handling of payment information, please refer to Point 5.1 of the Porsche Digital Service Infrastructure / Porsche ID General Privacy Policy.

The vehicles have a device for tracking the location and condition of the vehicle (especially current mileage). Using this device, it is possible for a limited number of employees to keep track of the contractually agreed mileage and current location of the vehicle.

You personal data will be processed on the basis of GDPR Article 6 [1] (c) and (f) in order to safeguard our legitimate interest, to provide you with the support you require and to prevent uses contrary to the contract and potential damage as well as to fulfil official and/or legal requirements or obligations, such as official, public prosecutor or judicial requests.

For the fulfilment of the contract in Germany, PSM GmbH uses selected service providers who can be chosen in the booking process on the Porsche Drive Rental website (under the following link: <https://customer.drive.porsche.com/ireland/en/porsche-drive-rental-stations>). Service providers are Porsche Centres within the German dealer organisation or companies affiliated with Porsche AG based in Germany. These service providers are carefully selected by PSM GmbH.

At the end of the rental period you will receive a summary of your trip data by e-mail. You can save this summary as you wish, or send it to third parties, independently of our offers, via your own terminal device or the third-party services you use.

After the end of the rental period, you also have the option of informing us by e-mail via an online dialogue (e.g. by awarding stars) how you enjoyed the rental. We process the data we collect on the basis of Article 6(1)(b) of GDPR in order to further improve the services based on your feedback.

2.3 Using the individual features without registration/login

The features within the framework of our website and the relevant processed personal data, purposes and legal bases are described below.

2.3.1 Contact via Live Chat

No prior registration and creation of a Porsche ID user account is required to use this feature.

In certain sections of our website we offer contact and advice via Live Chat. Live Chat allows you to communicate with one of our consultants via text messages. When you access and use Live Chat, your browser automatically transmits the following data at the beginning of use for technical reasons. We store this data separately from other data that you may transmit to us:

- Date and time of access
- Duration of website visit
- Type of web browser including version
- Operating system used
- Amount of data transmitted
- Type of event
- IP address.

The legal basis for this data processing is GDPR Article 6 [1] (f), whereby our legitimate interest is directed towards guaranteeing and maintaining the operation and security of our services and the elimination of faults. Within this framework, data is also processed by us for analysis purposes, without allocation to a specific person.

If you provide us with additional personal data via Live Chat, you do so on a voluntary basis. If personal data is required to clarify your request, we will point this out to you and ask you for your personal data. The texts you enter into the input mask during the Live Chat session are stored on our behalf on an external service provider's server. The legal basis for this data processing is GDPR Article 6 [1] (b).

2.3.2 Guest access for reservation and purchase of services and products via the "Online Marketplace" section

In addition to using the Online Marketplace with Porsche ID, customers can use the Porsche Store Marketplace section without prior registration and creation of a Porsche ID user account via the "Guest access" feature. For information on data processing in this context, please refer to Point 2.2.6.

2.3.3 Closest Porsche Drive Rental location

No prior registration and creation of a Porsche ID user account is required to use this feature.

This feature allows you to find the closest Porsche Drive Rental location with your device.

When this feature is used, the following categories of personal data will be processed:

- Location data of your device.

This is provided voluntarily. If you do not provide this data, however, we may not be able to fully comply with your wishes in relation to using this feature.

We shall process this data on the basis of GDPR Article 6 [1] (b) in order to provide you with the services you require in this connection, and to implement the associated contractual relationship with you.

2.3.4 Non-binding reservation inquiry via Porsche Drive Rental

No prior registration and creation of a Porsche ID user account is required to use this feature.

This feature allows you to contact us using a contact form to make a non-binding reservation inquiry. The data gathered here will be used solely to process your inquiry and to send you a non-binding offer.

(a) Mandatory data when making a reservation inquiry

When using this feature, the following categories of personal data, marked with an "*", will be processed as mandatory data:

- Title,
- First and last name,
- Date of birth,
- E-mail address,
- Mobile phone number,
- Address (street and house number, postcode and town/city),
- Required number of vehicles in the respective class,
- Required rental location,
- Required rental period,

Reservation inquiries are not possible without providing this mandatory data.

(b) Optional data when making a reservation inquiry

As part of your reservation inquiry, you also have the option of providing further data on a voluntary basis, i.e. the following categories of personal data:

- Your title,
- Your company,
- Your telephone number,
- Your comment.

Please note that this information is not required for registration inquiries and whether you want to disclose this data to us is completely up to you.

We shall process this data on the basis of GDPR Article 6 [1] (b) and (f) in order to provide you with the services you require in this connection, to implement the associated contractual relationship with you and to enable us to draw up an offer or reservation for you.

3. Rights of data subjects

As the person whose data is being processed, you have numerous rights at your disposal. In particular, you may object to the use of cookies or similar technologies at any time. For details please refer to our Porsche Smart Mobility Cookie Policy for Websites, which can be retrieved at <https://connect-store.porsche.com/ie/en/t/privacy>.

To find out about your additional rights, please refer to the information in Point 13 of the My Porsche and Porsche Connect Services / Porsche Digital Service Infrastructure General Privacy Policy, which you can access at <https://connect-store.porsche.com/ie/en/t/privacy>.

4. Changes to this Privacy Policy and version

We reserve the right to modify this Specific Privacy Policy. The current version of the Privacy Policy can always be found at <https://connect-store.porsche.com/ie/en/t/privacy>

Date: 01.06.2021