



# App Privacy policy

VERSION 1.0

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## Introduction

We know everyone says it, but at LYNK & CO, protecting your privacy is one of our top concerns. With openness being one of our core values, we want to give you as clear and transparent information as possible about how we use your personal data, so you can feel confident when using our products and services. This privacy policy describes how LYNK & CO processes your personal data when using the LYNK & CO app.



Your experience with LYNK & CO builds on several components that are designed to work together. Therefore, LYNK & CO has other privacy policies that should be read alongside this policy for a complete picture of the data processing. All policies are available on [lynkco.com/privacy](https://lynkco.com/privacy).

When using the LYNK & CO app, the data processing taking place will depend on corresponding features and services available in your car, the services you chose to activate as well as the availability of those services in your country. Therefore, this privacy notice describes the widest possible extent of data processing. If a feature or service is not available in your vehicle or your country, or you have deactivated a feature, no data processing will take place for that feature or service.

To learn more about how LYNK & CO processes and protect your personal data, please visit [lynkco.com](https://lynkco.com).

## Who we are

We, LYNK & CO International AB ("LYNK & CO", "we", or "us") are responsible for the processing of your personal data as referred to below. Our registered office is at Planetgatan 6, SE-417 55 Gothenburg, Sweden, with company registration number 559151-8161.

## When and why we process your personal data

In this section, you will find more detailed information about why we process your personal data, the categories of data, our legal basis for the processing, as well as for how long we retain your data for each purpose.

Signing in



Purpose	To sign in to the Lynk & Co app with your account and to adapt content and your experience based on your region and market.  To store your account information and settings.
Categories of personal data	Lynk & Co account (e-mail, password, name, country, phone number), technical identifiers, device and application data (IP-address, operating system, app version), language, region and market settings.
Legal basis	Performance of contract
Retention	Deleted in the app when signing out or when the Lynk & Co app is deleted.
Controller(s)	Lynk & Co

## Vehicle controls and digital key

Purpose	To provide vehicle remote control features such as the ability to lock or unlock the vehicle with the app, to see status information (fuel and charge levels, climate, tire pressure), and to be notified of vehicle alarms.  To see the last parked position of the vehicle and the position of your mobile device in relation to the vehicle. This is only visible locally in the Lynk & Co app.
Categories of personal data	Lynk & Co account, <b>vehicle identification number ("VIN") as well as its specifications</b> (model and model year, technical specification, hardware and software information), vehicle ownership and/or subscription type, information from your vehicle (status messages such as fuel and battery levels, vehicle alarms and error messages) and its position, the position of your mobile device and its specifications (model, operating system, technical specification and identifiers).
Legal basis	Performance of contract  For location-based features, you must have location services enabled in your mobile device and select at least "Once" for iOS or "Ask every time" for Android. Location data from the mobile device position is not shared with Lynk & Co.  When creating or using Digital Key, you must enable Bluetooth, and the location services in your mobile device needs to be set to "Always while using app" for iOS or "All the time" for Android. On Android 13 and up, you will need to allow connection to "Nearby Devices".
Retention	Deleted in the app when signing out or when the Lynk & Co app is deleted.

Controller(s) Lynk & Co

## Send a destination from the app to your car

To let you find an address in the app and send it to the vehicle's navigation.

**Purpose** For convenient access to your latest destinations, your address search history is stored locally in the app. Search history is not shared with Lynk & Co.

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**Categories of personal data** Lynk & Co account, destination addresses.

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**Legal basis** Performance of contract

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**Retention** Deleted when the Lynk & Co app is deleted.

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Controller(s) Lynk & Co

## Journey Camera

**Purpose** To transfer photos and videos from your vehicle to your phone.

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**Categories of personal data** Photos and videos taken with Journey Camera in your vehicle.

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**Legal basis** Performance of contract

To transfer the photos and videos captured with Journey Camera to your phone, you need to allow access to your phone's photo library. A folder called "Lynk & Co" will be created and used for the files.

Please note that our processing is limited to the local storage of photos and videos and transmission between the vehicle and your phone. You are responsible for ensuring that any photos and/or videos that are collected on your initiative are collected in compliance with any applicable data protection legislation (e.g. (as applicable) that you have the permission to take a photo of someone).

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**Retention** Files are stored in your **phone's** photo and video library until you delete them, even if the Lynk & Co app is deleted.

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Controller(s)

## Push notifications

Purpose	To send you push notifications from the Lynk & Co app, such as reminders of Car Sharing bookings, or when new software is available for your vehicle.
Categories of personal data	Lynk & Co account, selected language, device identifiers, and the types of notifications you chose to receive.
Legal basis	Consent
Retention	Push notification settings are stored until you deactivate push notifications in the app.
Controller(s)	Lynk & Co

## Analytics

Purpose	To understand how the app and its features are being used, improve the user experience and technical reliability of the app.
Categories of personal data	Lynk & Co account, your usage of the app and its features, including user behavior and technical data about your mobile device (device type, operating system and version, device language settings, IP-address), diagnostic app data (app version, error messages and crash reports, vehicle connection status and diagnostics), vehicle information (model, model year, type of ownership) geography (city, country, region and continent), region and market settings).
Legal basis	Consent
Retention	Up to 14 (fourteen) months from collection.
Controller(s)	Lynk & Co

## How we share your personal data

## Service providers, group companies, and authorities

To run our business and provide our products and services, we work closely with select service providers and business partners, as well as companies within the Lynk & Co group. When we refer to “**service providers**”, “**suppliers**” or “**sub-processors**”, those organizations are contractually bound to process your personal data under our supervision and only for specific purposes. We never share more information than what is strictly necessary for each supplier to provide their services.

**IT-suppliers.** We disclose your personal data to select suppliers that manage the operation, technical support and maintenance of various IT services that we use, such as cloud services and various business support applications.

**Service providers.** We disclose personal data to providers of analytics services (Google LLC and Firebase Inc.).

**Group companies and affiliates.** We disclose personal data to other companies within the Lynk & Co group that provide customer support and business support systems.

**Business partners.** We may disclose personal data to auditors (financial, regulatory) and legal counsels. Where possible, we limit their access to pseudonymized or anonymized information.

**Authorities and law enforcement.** In response to a valid and lawful request such as a court order, subpoena or other legal process by government or law enforcement authorities such as the police, public courts, privacy protection authorities or other governmental bodies, we may be legally required to disclose personal data about you and/or your vehicle. Your personal data may also be disclosed when necessary to protect the rights, property, or safety of you, us or others or otherwise as necessary to establish, defend ourselves against or enforce our own legal claims. Any request for data disclosure is carefully reviewed to ensure that it's valid, lawful, and proportionate before any information is disclosed.

## International transfers

While most of our data processing takes place within the EU or EEA area, we also work with service providers and suppliers located outside the EU and EEA.

Whenever we conduct international transfers of personal data, each transfer is subject to appropriate safeguards that makes sure each transfer complies with applicable law, and that your personal data is afforded the same level of protection as within the EU/EEA. These safeguards may include the implementation of EU Standard Contractual Clauses as issued by the European Commission, that the recipient is certified under the EU-U.S. Data Privacy Framework, or that the relevant country has been declared by the European Commission as having an adequate level of protection. In addition, we implement additional technical and organizational security measures when needed, such as encryption and pseudonymization.

Country	Recipients	Purpose	Safeguard
United States	IT suppliers	Cloud services, business support applications, analytics services	EU-U.S. Data Privacy Framework
	Service providers		EU Standard Contractual Clauses

# Your rights

Because it's your personal data, the law gives you certain data rights allowing you to have insight and exercise control over our use of your personal data. The applicability and extent of these rights vary depending on the specific processing situation, but always gives you the right to information about how your personal data is being used. If you want to exercise any of these rights, contact us using the contact information at the end of this policy. Read below for descriptions of the rights you have.

## Right to information and access

You have the right to know whether we are processing personal data about you, and if we do, information about the personal data, why we're using it, how it is shared, and for how long we store it. You can also get a copy of the personal data we have about you.

## Right to have your personal data deleted

In some cases, you have a right to request that we delete your personal data. This is the case when

1. the personal data is no longer needed for the purposes it was collected for,
2. you withdraw a consent you have given and there is no other legal ground to process the personal data,
3. the personal data is used for direct marketing and you unsubscribe from it,
4. you object to our **processing that is based on "legitimate interests" and we are unable to demonstrate compelling reasons for the processing which overrides your interests and rights,**
5. the data has been used unlawfully, or
6. deletion is required by law.

## Right to object

You have the right to object to our use of your personal data when our ground for using it is our "legitimate interest" or when we use it for marketing purposes. In some cases, we can continue to use your personal data even if you have objected to our processing. This can be the case if we can show compelling legitimate reasons for the continued use that outweigh your interests, or if it is for the purpose of establishing, exercising or defending ourselves against legal claims.

## Right to rectification

You have a right to correct or update any inaccurate personal data about you that we have and to ask us to have incomplete personal data completed. We may need to verify the accuracy of the new data you provide to us.

## Right to restriction

You also have a right to request that we restrict our use of your personal data. That is the case for example when the accuracy of the personal data is contested by you, or the processing is unlawful, but you do not want us to delete it and instead you request that we restrict our use of it.

## Right to lodge a complaint to a supervisory authority

You always have the right to lodge a complaint with a supervisory authority. You may do this in the EU/EEA member state where you live. For Lynk & CO International AB, the Swedish Authority for Privacy Protection (in Swedish; Integritetsskyddsmyndigheten, "IMY") is our primary supervisory authority. But you also have the

right to contact your national supervisory authority directly. You also have the right to seek a remedy from a national court.

### Right to data portability

When our use of your personal data is based on your consent or on a contract, you have the right to ask us to transfer, where technically feasible, the personal data we have about you to you or to another company of your choice ("data portability").

### Right to withdraw your consent

At any given time, you have the right to withdraw any given consents to our use of your personal data.

## Contact us

If you have any questions about your personal data, or if you want to exercise any of your rights, please contact us at [hello@lynkco.com](mailto:hello@lynkco.com). For contact details to Lynk & Co in your country, please visit [lynkco.com](https://lynkco.com).

Lynk & Co has appointed a Data Protection Officer who can be contacted at [dpo@lynkco.com](mailto:dpo@lynkco.com).

## Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. The latest version will always be available on [lynkco.com](https://lynkco.com) and from the Lynk & Co app. We may also notify you in other ways from time to time about how we use your personal data.