

# LYNK & CO

## Car Privacy Policy

VALID FROM 11 JUNE 2024

### 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 a Lynk & Co car and associated services. If you need more detailed explanations on the use of various features of your car, you will find more information in the Car Guide. Should there be any differences between the Car Guide and this privacy policy in terms of data processing, this privacy policy takes precedence.



Your experience of 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](https://lynkco.com).

When using your Lynk & Co car, the data processing taking place will depend on 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 policy describes the widest possible extent of data processing. If a feature or service is not available in your car 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).

This privacy policy does not cover:

Software, apps and services provided by third parties. In cases where we make available services or products that are not developed or managed by Lynk & Co (i.e. third-party services), the third parties themselves are responsible for their use of your personal data. For more information on data processing related to third-party services, we recommend you take part of the respective third-party terms of service and privacy policies that apply for each such third-party service.

Provision of the mobile internet connection service in your vehicle, as that service is provided by an independent mobile network operator.

Third party value-added services, such as fleet management services.

### 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. Where other data controllers are involved or otherwise responsible for the relevant processing, this is specified in connection with the description of the respective processing.

## 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.

In summary, we process your personal data for the purposes of:

1. Road safety and assistance. Emergency call services (eCall), event data recorder (EDR) and Lynk & Co Assistance (Roadside Assistance).
2. Maintenance. Service planning and remote diagnostics, and over-the-air software updates.
3. Connected Services and Lynk & Co in-car system apps. To enable Connected Services such as digital key and remote-control features, Car Sharing, voice assistant and Lynk & Co in-car system apps.
4. Research and development of products and services. Research and development activities for the purposes improving the quality, reliability and safety of our vehicles and how they are used, as well as to manage our manufacturer obligations and vehicle warranties.
5. To comply with laws, voluntary undertakings and to establish, defend or enforce legal claims. Vehicle emissions reporting, monitoring of cybersecurity threats, and sharing of personal data with law enforcement and other authorities.

### Road safety and assistance

#### Emergency call (eCall)

Purpose	To enable a direct communications link with emergency services (eCall) in case of a serious accident, either manually by pressing and holding the 'SOS' button, or automatically when an accident is detected by the vehicle's sensors. When activated, the vehicle will establish a communications link and transmit its location and other relevant information to the public safety answering point (PSAP). Data is collected only when eCall is activated.
Categories of personal data	Name, contact details, vehicle type, powertrain and vehicle identification number (VIN), time and location of the accident and <b>the vehicle's direction</b> of movement, vehicle status information (closed and open doors, battery condition and voltage levels), and any additional information provided by you to emergency services during communication.
Legal basis	

Legal obligation (as prescribed by applicable rules on emergency call services).

This is a mandatory feature for all vehicles sold in the EU/EEA.

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Retention	Personal data will not be retained for longer than necessary for the transmission to the appropriate public safety answering point (PSAP). PSAP will delete your data as soon as the matter has been resolved.
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Controller(s)	Lynk & Co Depending on the nature and severity of the accident, relevant information is transmitted to specialized public emergency services, acting as independent data controllers. If you want to learn more about the processing by emergency services, please read their privacy policy.
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## Event Data Recorder (EDR)

To record and store information about vehicle dynamics and safety systems shortly before, during and immediately after a traffic accident or collision-like situation. The data is recorded in order to analyze how vehicle systems work in these types of situations and to understand the circumstances in which traffic accidents, injuries and damage occur.

Purpose	The system does not record any data during normal driving conditions, nor does it register who is driving the vehicle or the geographic location of the accident or near-miss situation. However, other parties, such as the police, could use the recorded data in combination with the type of personally identifiable information routinely collected after a traffic accident. Special equipment and access to either the vehicle or the EDR is required to be able to access and interpret the registered data.
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Categories of personal data	The state and rate of activation of all safety systems and relevant input parameters of the on-board active safety and accident-avoidance systems, whether <b>seatbelts were fastened and tensioned, the driver's use of the steering wheel, accelerator and brake pedals, travel speed, braking and position, vehicle tilt levels on the road, and status of the eCall system.</b>  Lynk & Co does not disclose EDR information to third parties without the vehicle owner's consent. However, national laws and regulations may require disclosure of EDR information to police or other authorities.
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Legal basis	Legal obligation (as prescribed by applicable rules on vehicle safety standards).
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This is a mandatory function for all vehicles sold in the EU/EEA.

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Retention	
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The period recorded is usually up to 30 (thirty) seconds. Recorded information is stored in the vehicle until the vehicle is serviced or repaired.

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Controller(s) Lynk & Co

## Lynk & Co Assistance (Roadside Assistance)

**Purpose**

To provide you with roadside assistance services when needed, such as in the case of an accident, flat tire or vehicle breakdown. A roadside assistance call can be made from within vehicle, or by calling Lynk & Co directly. During the call with Lynk & Co, the advisor will assess the appropriate response and provide guidance on how to remedy the issue yourself, or, where that is not possible, arrange roadside recovery services (spot repair or towing to the nearest workshop) provided by our local service partners. In case of roadside recovery, relevant information such as your contact details and current location will be transmitted to our local service partner, depending on the scope of required services.

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**Categories of personal data**

Vehicle identification number (VIN), vehicle model specification, vehicle position and diagnostic information (error codes and warnings), the type of services requested and any additional information provided by you during communication.

Depending on the nature and scope of the request and required services, Lynk & Co may need to collect additional information (or process additional information already available in our systems, as applicable) in order to provide the required assistance services, such as your name, contact details, address, insurance details and order information, damage cause and information about and from the workshop that will handle the repair.

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**Legal basis** Performance of contract

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**Retention**

We retain your data associated with your roadside assistance request for up to 2 (two) years, and, if applicable, in accordance with applicable laws relating to financial reporting, which vary by region. For most customers, that requires at least 7 (seven) years.

Location data is processed only during the handling of your request.

Vehicle repair and maintenance data will become a part of a vehicle's service history.

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Controller(s) Lynk & Co

Depending on the nature and scope of response, relevant information such as your contact details and the current vehicle position will be transmitted to our local roadside assistance

service partner and, if applicable, partner workshops for carrying out vehicle repairs, who will then process the information as independent data controller(s). For more information on how the relevant partner process your personal data, please read their privacy policy.

## Stolen Vehicle Tracking and remote immobilization

Purpose	To locate a stolen vehicle, activate and deactivate remote vehicle immobilization, and facilitate vehicle recovery by law enforcement in case of vehicle theft. If the immobilizer is enabled, the vehicle will not be able to be started until the immobilizer is disabled. A vehicle may be reported stolen by <b>the vehicle's owner (you or Lynk &amp; Co, as applicable) or law enforcement authorities (police)</b> . For the Stolen Vehicle Tracking or remote immobilization processes to be initiated, an official police report must have been filed, and a case reference number must have been submitted to Lynk & Co.
Categories of personal data	Lynk & Co account, contact details, order information, subscription type and vehicle information (vehicle identification number (VIN), license plate number, vehicle model, position and direction of travel), case reference.
Legal basis	Performance of contract
Retention	For up to 12 (twelve) months after the case is closed. Location data is deleted when the case is closed.
Controller(s)	Lynk & Co

## Connected services and in-car system apps

### Connected Services

Purpose	To provide remote vehicle features with the Lynk & Co app such as locking or unlocking the vehicle using the digital key (doors, charging cover, trunk), locating the vehicle on a map (while parked), flashing vehicle lights and activating the horn, and seeing status information (fuel and charge levels, estimated range, tire pressure, climate, window and lock status).
Categories of personal data	Lynk & Co account, vehicle identification number (VIN) software and hardware versions and identifiers, vehicle position, vehicle status (battery status, charge and fuel levels, tire pressure, climate and heater, window and lock status).

## Performance of contract

Legal basis

In the vehicle's privacy settings, you decide which services and apps that can exchange data. When activating Connected Services, Lynk & Co will process data from your vehicle and Lynk & Co account to provide Connected Services. Disabling Connected Services will impact Lynk & Co app and Car Sharing functionality. Car Sharing and location-based features of the Lynk & Co app also requires that Vehicle Location Data is switched to ON.

Retention

Up to 30 (thirty) days after you have terminated your Lynk & Co account or up to 2 (two) years of account inactivity.

Controller(s)

Lynk & Co

## Personal settings

Purpose

Your vehicle and profile settings (activated services and consents, seats, steering wheel, rearview mirrors and interior lighting settings) are automatically synchronized to your Lynk & Co account. Whenever you login to a Lynk & Co vehicle with your account, the vehicle will automatically synchronize and adjust itself to your settings.

Categories of personal data

Lynk & Co account, vehicle identification number (VIN) software and hardware versions and identifiers, personal settings (activated services and consents, information of which apps you have installed, seats, steering wheel settings, rearview mirrors and interior lighting settings).

Legal basis

Performance of contract

Retention

Up to 30 (thirty) days after you have terminated your Lynk & Co account or up to 2 (two) years of account inactivity.

Controller(s)

Lynk & Co

## In-car apps (system apps)

### App store

Purpose

The app store lets you download, install and update Lynk & Co and third-party in-car apps.

Categories of personal data	<p>Lynk &amp; Co account (identifier), vehicle identification number (VIN), software and hardware versions and identifiers, app information (name, version, downloads, installations).</p> <p>App downloads, installations and updates are managed with reference only to an encrypted identifier of your Lynk &amp; Co account. If you are using app store in Guest Mode, the vehicle identification number (VIN) will be used as an encrypted identifier instead.</p>
Legal basis	Performance of contract
Retention	<p>Vehicle identifier, software and hardware versions and identifiers, app information (name, version, downloads, installations) is retained for 10 (ten) years.</p> <p>Account identifier is retained during use and for up to 5 (five) years of inactivity.</p>
Controller(s)	Lynk & Co
<b>Car Sharing</b>	
Purpose	<p>To provide the services and features of Car Sharing, such as the ability to display or hide your vehicle as available for Car Sharing, review upcoming bookings, or, if you are using the vehicle as a borrower, to see the status of an ongoing sharing session.</p> <p>Car Sharing requires a Lynk &amp; Co account as well as a Car Sharing profile. To enable Car Sharing, Connected Services and Vehicle Location Data must be switched to ON in the vehicle's privacy settings. In addition, Car Sharing must have location data access permission in the vehicle's app permissions settings.</p> <p>To learn more about how Lynk &amp; Co process your personal data when using Car Sharing, read the Car Sharing Privacy Policy.</p>
Categories of personal data	Lynk & Co account (Car Sharing profile), vehicle identification number (VIN), sharing details in before and during a session (pick-up and drop-off location, <b>lender or borrower's</b> name and initials, time of sharing session and remaining time), software and hardware versions and identifiers.
Legal basis	Performance of contract
Retention	For applicable data retention on Car Sharing, please read the Car Sharing Privacy Policy.

Controller(s)	Lynk & Co
Co:lab	
Purpose	<p>To gather and follow up on ideas and suggestions for product improvements. The Co:lab app lets you submit ideas and suggestions for improvements to Lynk &amp; Co anonymously by recording a short voice message with your idea.</p> <p>If you consent, the transcript is retained in identified form, in order for Lynk &amp; Co to contact you for a follow-up on your submission.</p>
Categories of personal data	Lynk & Co account, contact details (in case of a follow-up), audio recordings and transcripts.
Legal basis	<p>Legitimate interest (to process and analyze your submission).</p> <p>Consent (to contact you for a follow-up).</p>
Retention	Audio recordings are transcribed and then deleted. The anonymized transcript is used for research and development purposes. If you gave your consent to a follow-up, transcripts are retained for up to 1 (one) year.
Controller(s)	Lynk & Co
Journey Log	
Purpose	<p>The Journey Log app automatically logs all your trips, which may be useful to manage mileage expenses or keep track of energy consumption.</p> <p>You can enable and disable Journey Log at any time by disabling <b>Vehicle Location Data</b> in the vehicle's privacy settings.</p>
Categories of personal data	Lynk & Co account, vehicle identification number (VIN), vehicle position (start and endpoint), traveled route, mileage, duration, average speed, and energy consumption.
Legal basis	<p>Performance of contract</p> <p>To enable Journey Log, Connected Services and Vehicle Location Data must be switched to ON in the vehicle's privacy settings.</p>

Retention	Journey Log data is stored for up to 400 days depending on car model. You can disable the Driving Journal at any time, and by doing so the data will stop being collected. This does not trigger the deletion of previously collected information.
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Controller(s)	Lynk & Co
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## Voice assistant (Frank)

Purpose	To enable vehicle commands using your voice, either by (depending on your settings) using a wakeup word ("Hey Frank") or tapping the Frank button in the center display.
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Categories of personal data	Lynk & Co account, vehicle identification number (VIN), software and hardware versions and identifiers, audio recordings (voice commands) and transcripts, vehicle position (for location-based commands).
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Legal basis	Performance of contract
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Retention	Audio recordings and transcripts are retained for fourteen (14) days.
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Controller(s)	Lynk & Co
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## Maintenance

### Service planning and remote diagnostics

Purpose	In order to maintain your vehicle in good condition, your vehicle communicates diagnostic readouts to Lynk & Co for analysis. This helps us to perform vehicle and battery diagnostics remotely in order to detect early signs of vehicle problems. We can then assist with necessary service and maintenance. Service planning also helps us optimize production and deliveries of spare parts, and enables workshops to better prepare your visit.
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Categories of personal data	Information generated by the vehicle, its sensors and systems (odometer, service indicators, alarms, warnings, lights, faults, diagnostics, temperature, timestamps, state of health, status and behavior of onboard systems and functions).
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Legal basis	Consent
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Retention	We will retain the information for 3 (three) years, except for information on <b>the vehicle's high-voltage battery</b> , which is retained for 10 (ten) years.
Controller(s)	Lynk & Co

## Over-the-air software updates

Purpose	<p>Software updates brings you new features and improvements of stability and security <b>of the vehicle's software</b>.</p> <p>When enabled, your vehicle will automatically download new software as it becomes available.</p> <p>Refusing software updates may prevent you from being able to use updated services and features or impact their functionality. It may also increase exposure to software security threats.</p> <p>You can also choose to have the updates installed at one of our workshops.</p>
Categories of personal data	Vehicle identification number (VIN), vehicle specification (model, manufacturing date, software and hardware versions and identifiers), diagnostic trouble codes (DTC), IP address, installation status and results.
Legal basis	Consent
Retention	For the lifetime of the vehicle.
Controller(s)	Lynk & Co

## Research and development of products and services

### Diagnostic readouts from maintenance and repairs

Purpose	When maintenance and repairs are carried out on your vehicle, the workshop performing maintenance and repair services will access diagnostic readouts from the vehicle using Lynk & Co diagnostic software. Lynk & Co will receive the diagnostic information for the purposes of analyzing and improving the quality, reliability and safety of our vehicles, and to manage our manufacturer obligations (such as recalls and reclamations) and vehicle warranties.
Categories of personal data	Information related to the vehicle (vehicle identification number (VIN), model, production year, software and hardware versions and identifiers);

Information related to the vehicle's powertrain and battery (software and hardware versions and identifiers, cell voltages, state of charge, charging information, configurations, calibrations, temperatures, alarms, warnings, faults, diagnostics, timestamps, state of health and overall status);

Information generated by the vehicle and its sensors (mileage, service lights and indicators, alarms and warnings, diagnostic trouble codes (DTC), temperature readings, fuel and energy consumption, timestamps, and overall status and health of the vehicle and its various on-board systems); and

Information about how the vehicle is used (configurations, settings, device connections, charging information, interactions with the information head unit (center display), use of remote and connected services and use of accelerator and brakes, steering, seat belts and doors).

Where needed to fully investigate an issue that you or a workshop bring to our attention, we may need to carry out an extended analysis by accessing information generated by the information head unit (IHU), display head unit (DHU), telematics and connectivity antenna module (TCAM) and their associated signals (GPS, data identifier (DID), diagnostic trouble codes (DTC), vehicle network diagnostics, on-board software diagnostics, start-up diagnostics, component logs), data recorded by the Event Data Recorder (EDR) and other systems relating to vehicle safety systems (speed, steering angle, brake power, deployment, and use of safety systems etc.), vehicle settings and configurations, and if relevant, information related to the driver (Lynk & Co account, contact details).

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Legal basis	Legitimate interest (to analyze and improve the quality, reliability and safety of our vehicles). Legal obligation (to fulfil our legal obligations and other manufacturer-related obligations, such as recalls).
Retention	For the lifetime of the vehicle. Extended analysis data is retained until the issue with your vehicle has been resolved.
Controller(s)	Lynk & Co

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To comply with laws, voluntary undertakings and to establish, defend or enforce legal claims

Emissions monitoring and reporting

Purpose

To monitor and report vehicle specific emissions data to the European Commission pursuant to Regulation (EU) 2019/631.

Emissions data is collected and reported once for the year the vehicle was registered for the first time.

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Categories of personal data	Vehicle identification number (VIN), vehicle specific emission related data (ref. Regulation (EU) 2020/683 Annex VIII).
Legal basis	Legal obligation
Retention	Until the data has been reported.
Controller(s)	Lynk & Co

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### Monitoring of cyber security threats

Purpose	To monitor the vehicle for cyber security threats through an intrusion detection system that checks the vehicle and its systems for abnormal activity.
Categories of personal data	Vehicle identification number (VIN), installed software versions, vehicle configuration, network endpoint and bandwidth volumes, wi-fi information, installed apps and permissions (app names, identifiers, versions, permissions, and user data size), system time, system logs and crash reports, list of trusted certificates and security keys.
Legal basis	Legal obligation
Retention	After we have processed the data above, we will delete or make your data anonymous in our servers after 90 (ninety) days. The anonymized data will be kept for research and development purposes to enhance our general goal of improving your security against cyber threats.
Controller(s)	Lynk & Co

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### Requests from law enforcement

Purpose

To disclose personal data to law enforcement and other requests where legally bound to do so.

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Categories of personal data	The categories of personal data requested by the relevant authority, which may vary but never exceed what is specifically requested by the authority in each case.
Legal basis	Legal obligation
Retention	We keep records of the requests received and responses provided for up to 2 (two) years after the request has been handled.
Controller(s)	Lynk & Co

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## Where we get your personal data from

Most of the personal data that is processed in accordance with this policy is collected directly from your vehicle. Besides, there are some occasions where we collect data from other sources.

**Workshops.** When service and maintenance is performed on your vehicle, we will collect diagnostic data as well as maintenance and repair information for the purpose of maintaining the repair and maintenance record of your vehicle.

**Customer support.** In case you are in contact with us for roadside assistance, we receive information directly from you as part of handling your request. We may also process information already available in our systems, such as your Lynk & Co account and order information.

**Authorities and public sources.** In case of vehicle recalls, we may need to collect your name, address and contact details from authorities or other publicly administrated records in order to administer the recall process.

## How we share your personal data

### Service providers, business partners, 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 affiliate companies within the Lynk & Co group. When we refer to "**service providers**" or "**suppliers**", 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.

**Service providers.** 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.

**Other's apps and services.** You may connect your vehicle with third-party services such as in-car or mobile applications.

Group companies and affiliates. We share vehicle data (diagnostic information, hardware and software information) to other companies within the Lynk & Co group for product research and development purposes, such as in the case of component failures and warranty related repairs. This information identifies your vehicle by its vehicle identification number (VIN), but not you directly.

Workshops. In order for workshops to be able to perform vehicle service and maintenance, they need to access previous repair and maintenance history of the vehicle. This information is shared under our legal obligation to make repair- and maintenance information available to workshops and other independent actors.

Business partners. We may disclose personal data to finance and leasing partners, insurance companies, vehicle charging and mobile network operators, and roadside assistance services, market research companies, 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 we strive to locate our data processing within the EU or EEA area, we also work with service providers and suppliers located outside the EU and EEA. We always ensure that the same high level of protection applies to your personal data according to the GDPR, even when the data is transferred outside of the EU/EEA. Regarding transfers to the United States, we have entered into EU Standard Contractual Clauses with all relevant third parties (article 46 of the GDPR) or they are certified under the EU-U.S. Data Privacy Framework, with the U.S. Department of Commerce (**each, a "Safeguard"**). In case of transfers of vehicle data to group companies and affiliates in China, we have entered into EU Standard Contractual Clauses with those affiliates. In addition, we take additional technical and organizational security measures when needed, such as encryption and pseudonymization. More information about each Safeguard can be found on the [European Commission's website](#). You can also request a reference or copy of each Safeguard by contacting Lynk & Co.

Country	Recipients	Purpose	Safeguard
United States	Service providers	Cloud services, business support applications	Adequacy Decision EU Standard Contractual Clauses
China	Group companies and affiliates	Product research and development (vehicle diagnostic information)	EU Standard Contractual Clauses

# Make it yours with privacy settings

In the **vehicle's** center display, you can view and change vehicle privacy settings according to your preference, such as setting app permissions for microphone and location data access, as well as settings for Connected Services and Vehicle Location Data for Lynk & Co apps and services. You can change these settings at any time. Changes to privacy settings may limit vehicle, app and service functionality, but will not affect safety related and legally required features. Privacy settings are available for model year 2024 and later.

**App permissions.** Allows you to adjust app permissions to access location data, the microphone, or interior camera.

**Connected Services.** Allows you to use the Lynk & Co app to see the status of your vehicle, where it is parked, and to control locking/unlocking and climate systems. Location-based features require that you also enable Vehicle Location Data.

**Facial recognition.** Facial recognition can be used to authenticate logins to your driver profile using the interior camera. Facial recognition data, including mathematical representations of your face, is encrypted and protected from external access. Data used by facial recognition never leaves your vehicle and is never backed up to Lynk & Co servers or anywhere else.

If you choose to enable facial recognition, you can control how the feature is used and disable it at any time. Disabling facial recognition will delete facial recognition data, including mathematical representations of your face, from your vehicle. Facial recognition data will also be deleted automatically if resetting your vehicle to factory settings.

**Over-the-air software updates.** Allows the vehicle to automatically download new software as it becomes available. Refusing software updates may prevent you from being able to use updated services and features or impact their functionality. It may also increase exposure to software security threats. You can also choose to have the updates installed at one of our workshops.

**Service planning and remote diagnostics.** Allows Lynk & Co to access remote vehicle diagnostics in order to enable proactive vehicle maintenance. Your vehicle communicates diagnostic information to Lynk & Co for analysis, which helps us to proactively detect the need for workshop maintenance, optimize production and deliveries of spare parts, and enables workshops to better prepare your visit.

**Vehicle Location Data.** Allows Lynk & Co to provide features and services based on the current position of your vehicle, such as locating where your vehicle is parked using the Lynk & Co app, or logging your trips with Journey Log. With this setting, you can choose whether apps and services from Lynk & Co can access Vehicle Location Data.

If you disable this setting, some features and services will not work as intended, such as location-based features of the Lynk & Co mobile app, Car Sharing, and other apps from Lynk & Co with location-based features. Disabling Vehicle Location Data means location data will not leave the vehicle, except when required by law or to enable location-based apps and services from Lynk & Co or third parties which you have separately agreed to.

**Voice assistant (Frank).** When enabled, Frank lets you control various features using your voice, either by **(depending on your settings) using a wakeup word ("Hey Frank") or tapping the Frank button in the center display.** For location-based voice commands (such as setting a destination), vehicle location data must be switched to ON. The wake-up word can be enabled or disabled.

# 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 if we are processing personal data about you, and if we do, you have the right to receive information about the personal data and why we're using it, how it is shared, and for how long we store it. You also have the right to receive 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 have your personal data deleted. 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 we have no other legal basis 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 reasons for the processing which override your interests and rights,**
5. the data has been processed 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. You also have the right to contact your national supervisory authority directly, and 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 obtain a copy of the personal data that you have provided to us in a structured, commonly used and machine-readable format and transfer it 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 in your vehicle (model year 2024 and later) through automatic updates, as well as on [lynkco.com](https://lynkco.com). We may also notify you in other ways from time to time about how we use your personal data.