

## Personal Information Protection Statement for My Bentley Services

Effective from July 23, 2020  
Update on December 23, 2024

Volkswagen Group Import Company Limited (“**VGIC**”) is a limited liability company incorporated under the laws of the People’s Republic of China (“**PRC**”) with its domicile at Room 316, Kaili Building, No.188 Tianbao Road, Tianjin Free Trade Pilot Zone (Tianjin Port Free Trade Zone), PRC. The Bentley brand vehicles sold by VGIC communicate with VGIC or service providers’ data servers using a mobile telephone unit or embedded SIM card. China Unicom Smart Connection Technology Co. Ltd (“**CUSC**”, together with VGIC, collectively referred as “**we**”, “**us**” or “**our**”) is a limited liability company incorporated under the laws of the PRC with its domicile at 266, Room 106, Building 2, no. 8, Xing Sheng South Road, Miyun District, Beijing 101500, PRC, provides corresponding information and operational services for the My Bentley Services in the PRC.

The following “ Personal Information Protection Statement for My Bentley Services” (hereinafter referred to as the “**Statement**”) explains how we, our affiliates and our accredited service providers collect, use and process the personal information of the users (hereinafter referred to as “**user**” or “**you**”). In this Statement, personal information refers to various information related to identified or identifiable natural persons recorded electronically or by other means, excluding anonymized information.

If you have any questions or concerns about the Statement, or hope to complain about our possible violation of relevant laws and regulations, please contact our customer service hotline 400-650-8626 or by email to [mybentley@bentleymotorschina.com](mailto:mybentley@bentleymotorschina.com).

The Statement will provide you with the following information:

1. How we collect and use your personal information
2. How we store your personal information
3. How we entrust processing, share, transfer, and publicly disclose your personal information
4. How we transfer your personal information globally
5. How we protect your personal information
6. Your rights
7. How we process children’s personal information
8. How we update the Statement
9. How to contact us

### **1. How we collect and use your personal information**

#### **1.1 What personal information is collected by us**

We collect your personal information by strictly following relevant laws and regulations. For the purpose of this Statement, sensitive personal information refers to personal information that, once leaked or illegally used, may easily lead to infringement of the personal dignity or harm to the personal and property safety of a natural person, including biometrics, religious beliefs, specific identities, medical health, financial accounts, whereabouts and trajectories, personal

information of minors under the age of fourteen, and vehicle whereabouts, trajectories, audio, video, images and other information involved in the process of vehicle design, production, sales, use, and operation and maintenance, etc. Sensitive personal information has been marked in **bold and underlined** for your special attention.

### 1.1.1 Registration and activation of My Bentley Services

When you activate My Bentley Services, we collect and process the following types of personal information in order to complete the car connectivity services account registration: name, gender, **ID card number or passport number**, email address, mobile phone number, name and phone number of emergency contact, and VIN. According to current PRC laws and regulations, we collect the following types of personal information in order to complete the SIM card real-name authentication: name, **identity information (such as ID number or passport number)**, address, mobile phone number, SIM card number, VIN and **dynamic portrait video**. If you refuse us to collect aforementioned information, you will not be able to complete SIM card real-name authentication.

### 1.1.2 Use My Bentley Services

We and our qualified third-party service providers collect, process, transfer and use the following types of personal information in accordance with applicable laws. **Please acknowledge that, restricted by the systems and software equipped by the vehicle, some of the vehicle models might not be able to provide all of the following My Bentley Services. For detailed service functions provided by My Bentley Services, please refer to the car connectivity functions for the specific car model specified at: [https://support.bentleymotors.com/cn/zh\\_hans/support-bentley/service-availability.html](https://support.bentleymotors.com/cn/zh_hans/support-bentley/service-availability.html).**

**Further, you acknowledge and agree that we might adjust third-party services sources from time to time due to business cooperation adjustments.** At the same time, we wish you understand that most of My Bentley Services are provided through our service providers who provide or prepare related content and information for specific services. For the purpose of providing My Bentley Services, we will share the personal information collected and processed during the course of the service with these service providers in the following method. Due to technical reasons, once My Bentley Services have been activated, activation could not be withdrawn during the provision of the services. Except the services of Emergency Call, Roadside Assistance Call, and Stolen Vehicle Locate (SVL), you can suspend using certain services below to stop us collecting personal information related to the respective services through using the privacy mode.

#### (1) Navigation Service

To provide you with online navigation and other location based services (including provide live road conditions, point of interest search, online map updates, satellite maps, point of interest calls, online search etc.), when you use the Bentley Multimedia System (“BMS”) navigation service pre-installed in your vehicle, we will collect and/or use your vehicle’s VIN code, **current vehicle location**, destination set by vehicle, and **records of your call with the service answering specialist**. At the same time, we will share the de-identified vehicle identification number (PVIN) and account information (PUID), your current vehicle location, speed and direction of travel, your settings related to traffic information in the vehicle (including destination and route

preferences entered in the navigation system), navigation-related data between the vehicle and your/the user's account (including common items, recent destinations, navigation route), the time you access the navigation service, the type of request you make through the BMS, the items you designate (including search terms, etc.), time stamps, information about the software version used, the map or map version used with our third-party service provider with relevant surveying and mapping qualifications (i.e. AutoNavi Software Co., Ltd., contact information: Personal\_Information\_Officer@autonavi.com). The personal navigation assistant service of the navigation service is provided by CUSC. Your personal information will not be collected by default under this service, and your personal information will not be collected and processed by us until we obtain your consent and you take the initiative to trigger the function.

## **(2) News, Weather**

News and information services keep you updated with the headline news. Weather information services can help you to understand the weather conditions at your current location or your chosen destination. Each time users access this service, the following types of user data are collected and processed by us: the time you access the service, and the type of request you make through the BMS, the vehicle ID, **the vehicle location (location data)**, and the item requested by user (search term). If you refuse our collection of your **location data**, we will not be able to provide you with location-based search services.

## **(3) Emergency Call**

In the event of an accident, the emergency rescue service will be automatically activated to initiate a call to Bentley Emergency Rescue Call Center. Staff at the call center will be able to accurately locate your position and provide you with guidance and assistance, and will coordinate the necessary rescue services. Additionally, you can manually activate the emergency rescue service by pressing the SOS button on the overhead console.

The emergency call service is provided by service provider Shanghai Pateo Network Technology Service Co.,Ltd. ("**PATEO**") , domiciled at Room 3701, No. 866 of East Changzhi Road, Hongkou District, Shanghai, PRC. Emergency call is either made automatically when internal vehicle sensors are activated or manually (by pressing the SOS button).

The following types of user data are collected and processed by us for the emergency call service: VIN, **vehicle location**, vehicle type, vehicle fuel type, SIM card number of the vehicle, time of the emergency event, number of passengers in the vehicle and seating positions, language setting, airbag status and crash level. In order to allow the emergency call center (hereinafter referred to as "**Call Center**") use the last known location of the vehicle when the current location cannot be identified, we will collect the **vehicle location** before the last shutdown of engine even if no emergency call service is activated, and store it in the vehicle at all times.

When an emergency call is triggered, the types of data specified previously will be sent to VGIC and from there made accessible to the Call Center. The Call Center will establish an automatic audio connection with the vehicle occupants and provide the best response action to the incident (e.g. ambulance, fire brigade, police) based on both the data received and information

gained from the communication. In the vehicle, each emergency call is logged in a ring buffer (limited to retaining emergency call data about the incident has occurred but will not retain the content of communication) and regularly overwritten. The Call Center records the **emergency call audio** and stores the recording (to call back the vehicle or respond to possible issues)) for a short period. When the service is triggered automatically, it cannot be suspended manually. Your vehicle will not be tracked in normal circumstances as a result of activating this service. For the purpose of providing this service, VGIC will also transfer the customer's name and mobile phone number to PATEO through CUSC.

#### **(4) Roadside Assistance Call**

In the event of a breakdown, "Roadside Assistance Call" can directly connect to Bentley Roadside Assistance Call Center, where staff will arrange rescue services for you. You can also initiate the call by pressing the roadside assistance button on the overhead console.

The roadside assistance call service is provided by service provider PATEO. Currently, only **user's voice** will be transferred after roadside assistance call is activated, in which case the agent of the roadside call center will communicate with you and record information provided by you during the conversation (VIN, **location**, vehicle status and other information you provide to the agent during the conversation). If it is necessary, such information may be communicated orally to local third-party service providers (such as towing companies). For documentation purposes, the call center only stores the conversation history after the call has been completed and the issue has been resolved. The roadside assistance call can be cancelled at any time.

#### **(5) Stolen Vehicle Locate (SVL)**

If your vehicle is stolen, you can contact Bentley Stolen Vehicle Customer Service Center to initiate a GPS tracking request. The staff will attempt to locate your vehicle and contact the local police to assist you in recovering the stolen vehicle.

SVL service is provided by service provider PATEO. In the event that a vehicle is stolen, and the theft is reported to the law enforcement agencies, the Bentley SVL Center of PATEO (the "**Service Center**") will identify the **vehicle location** based on the request of the car owner, and provide such information to the law enforcement agencies solely for the purpose of locating and finding the vehicle. During a phone call with the Service Center, the agent at the Service Center will ask the name of the car owner, VIN, phone number, vehicle model and color of the vehicle. For documentation purposes and in case of potential dispute, the Service Center only stores the customer name, VIN, **conversation** and **location** records in associated with the incident, so that the police may retrieve the case.

#### **(6) Data Package Plan**

You may purchase a data package for the in-vehicle wireless connection. This service is provided by China Mobile Group Shanghai Co., Ltd. ("**CMCC**"), domiciled at No. 200, Changshou Rd., Putuo District, Shanghai, PRC. You will enter into the Service Agreement for the data package service with CMCC. VGIC does not have access to or use any of your data associated with this service.

#### **(7) My Bentley App**

My Bentley App provides you with a range of remote vehicle control services (Lock Unlock; Find My Car; My Car Status; Remote Honk and Flash etc.). Each time a service is accessed via My Bentley App, VGIC will collect and process the following types of personal information: your name, email address, name of emergency contact, VIN, vehicle ID, **vehicle location**, and other personal information relevant to the service. For more detail about My Bentley App, please refer to the My Bentley App Privacy Statement.

### **(8) Wi-Fi Hotspot Services**

The Wi-Fi hotspot allows drivers and passengers to access the Internet from within the vehicle at any time. The wireless network hotspot can connect up to eight devices,

This feature may use your MAC address and device name. Please note that this data is only stored within the vehicle to allow you to reconnect to your device more quickly, and we do not collect or use this information.

### **(9) Voice Dialogue**

Voice dialogue system provides a quick voice command method to activate the vehicle's functions. We collect and process your **voice information** and **vehicle location** only after you actively trigger the function. The voice dialogue system can be used online or offline. You can agree to the use of online services through "Settings – General – Voice Dialogue System – Agree to Use Online Voice Dialogue System".

The online voice dialogue system provides voice commands navigate points of interest, voice messaging, and maximizes the accuracy of voice recognition and improves user experience. Your **voice information**, **vehicle location**, de-identified vehicle identification number (PVIN) and account information (PUID) are collected and transmitted to third-party service provider Shanghai Jidou Technology Co., Ltd. (company address is 3rd Floor, Building B, No. 58 Xiangke Road, Pudong New Area, Shanghai) and Volkswagen-Mobvoi (Beijing) Information Technology Co., Ltd. (company address is 3rd Floor, Block D, Jingyi Science and Technology Building, No. 9 Dazhongsi East Road, Haidian District, Beijing) for identification and processing, and will be deleted immediately after processing is completed.

The offline voice dialogue system provides voice command control of the in-vehicle air conditioning, making phone calls, listening to radio channels, navigation and search and other services. Your voice messages are only processed in the car and are not transmitted to our online service provider and are deleted immediately after processing is completed.

Voice dialogue system trigger mode: the voice conversation system can be activated by the voice buttons on the screen, the voice buttons on the multifunction steering wheel, or by saying the wake word "Hey Bentley".

The voice wake up word feature is a special voice detection technology. When you enable the wake up word conversation function in the voice settings, you can directly activate the voice dialogue by saying "Hey Bentley." The wake up word "Hey Bentley" is not activated by default,

and in-car voice information can only be detected after obtaining your consent. If you wish to withdraw your consent, you can do so by navigating to “Settings - General - Voice Dialogue System - Activate Voice Dialogue with Wake up Word ‘Hey Bentley’” to withdraw your consent..

### **(10) My Bentley App Studio**

My Bentley App Studio is a vehicle terminal information entertainment system developed upon the Android system and it is provided by Shanghai Jidou Technology Co., Ltd. (hereinafter referred to as “JDO”; contact information: 504 Building 3, No. 111, Xiangke Road, Pudong New District, Shanghai).

My Bentley App Studio provides pre-installed applications and third-party application services, and you may freely choose to use them based on your needs. In order to identify your vehicle to provide you with relevant services, JDO would obtain de-identified vehicle identification number (PVIN) and account information (PUID) based on the vehicle identification and service token distributed to the vehicle through our backend system. Please refer to the relevant privacy policies and user agreements for corresponding services regarding the services provided by My Bentley App Studio and detailed information about the collection of personal information.

#### **1.1.3 Improvement or Development of My Bentley Service**

We may take technical measures to statistically analyze your personal information, to ensure that the processed information is statistical information and does not contain any personal information that could not be used to identify your identity. We may use these statistical information to improve and develop My Bentley service, and may share it with third parties.

### **1.2 Exceptions to Consent**

Please be aware that in accordance with relevant laws and regulations, we may process users’ personal information without your consent under any of the following circumstances:

- 1) where it is necessary for the conclusion or performance of a contract to which you are a party
- 2) where it is necessary for the performance of statutory duties or statutory obligations;
- 3) where it is necessary for the response to a public health emergency or for the protection of the life, health and property safety of a natural person in an emergency;
- 4) where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the processing of personal information is within a reasonable scope;
- 5) where it is necessary to process the personal information disclosed by the individual concerned or other personal information that has been legally disclosed within a reasonable scope in accordance with the provisions of the laws; and
- 6) other circumstances prescribed by laws and administrative regulations.

## **2. How we store your personal information**

Unless otherwise specified under this Statement, personal information collected by VGIC will be stored at a data center located in Beijing, PRC. We have entrusted third-party service provider with relevant qualifications to provide technical support, and we have adopted strict physical security, IT security, and access control measures to protect your personal information.

VGIC and its affiliates will only retain users' personal information for the period of time as long as necessary to fulfil the purposes mentioned above, or for the purposes of complying with legal or audit requirements. When we no longer need to use users' personal information, we will remove it from our systems and records, or take steps to properly anonymize such data, so that users can no longer be identified (unless we need to retain your information to comply with legal or regulatory obligations of VGIC or its affiliates).

### **3. How we entrust processing, share, transfer and publicly disclose your personal information**

#### **3.1 How we entrust the processing of your personal information**

In order to provide you with relevant services, we may entrust the processing of your personal information to VGIC affiliates or third-party service providers. We will enter into strict confidentiality agreement with any company, organization or individual to which personal information we entrust the processing, and require such company, organization or individual to process personal information in accordance with our requirements, this Statement and any other relevant confidentiality and security measures. VGIC affiliates and our authorized service providers will strictly comply with this Statement, and adopt necessary measures to ensure the confidentiality and security of your personal information. We will never allow third parties to share, transfer or disclose your personal information for unauthorized purposes.

#### **3.2 How we share your personal information**

In principle, your personal information will not be shared with any other company, organization or individual, except in the following circumstances:

- Having obtained your explicit authorization or consent, or other legal basis;
- Required to be provided in accordance with applicable laws and regulations, legal procedures or mandatory government requirements or judicial rulings;
- Under the premise of taking effective measures to protect the security of your personal information (including, but not limited to, entering into relevant confidentiality agreements, etc.), we may share with our authorized entities listed in this Statement. Our authorized service providers will strictly comply with the purposes and related provisions as stated in this Statement, and adopt necessary measures to ensure the confidentiality and security of your personal information. We will never allow third parties to share, transfer or disclose your personal information for unauthorized purposes.

#### **3.3 How we transfer your personal information**

Your personal information will not be transferred to any company, organization or individual, except in the following circumstances:

- Be transferred to other parties with your explicit consent or have obtained other legal basis;

- In case of a merger, division, dissolution, acquisition or bankruptcy, if personal information transfer is needed, you will be informed of the name and contact information of the recipient of your personal information. The companies and organizations receiving your personal information will be required to continue to be bound by this Statement, otherwise they are required to ask for your authorization and consent again.

### **3.4 How we publicly disclose your personal information**

Your personal information will be publicly disclosed only under the following circumstances:

- With your explicit consent;
- Obtained other legal basis, such as be publicly disclosed based on mandatory requirements of laws, legal procedures, litigation or government authorities.

### **4. How we transfer your personal information globally**

Please refer to Consent Letter to My Bentley Services Cross-border Transfer of Personal Information.

### **5. How we protect your personal information**

Ensuring the security of personal information is a high priority for us. Thus, we use up-to-date technical and organisational measures and implement tested embedded security mechanisms and standards. Our security measures include (but not limited to) access control, system hardening, network vulnerability scan and management, security awareness training, logging and security incident management, transmission and storage encryption. We extend the security measures when we develop new functions so that we ensure the compliance of current data protection regulations are complied with.

In case of a personal information security incident, we will investigate according to internally developed emergency plan, take all necessary measures to eliminate potential risks, and notify you in accordance with relevant laws and regulations. At the same time, we will also proactively report the processing of personal information security incidents pursuant to the requirements of the regulatory authorities.

However, if information is transmitted via the Internet as part of My Bentley Services, the security of these data cannot be guaranteed. You should also understand that there may be circumstances amount to force majeure which cannot be foreseen, avoided or overcome by VGIC or its affiliates, and user's personal information may still be disclosed, destroyed, tampered with, lost, improperly used or otherwise illegally used. In such circumstances we will inform the affected users or publish relevant details in accordance with applicable law and regulation.

### **6. Your rights**

In accordance with the relevant laws, regulations and standards of the PRC, we guarantee that you may exercise the following rights with respect to your personal information:

#### **6.1. To access your personal information**



You have the right to access your personal information, excluding the exceptions provided by laws and regulations. If you want to exercise the right, you may contact us in the ways set out in this Statement.

## **6.2. To correct your personal information**

If you find any error with your personal information being processed by us, you have the right to request us to make corrections. If you would like to exercise the right to correct your personal information, you may contact us in the ways set out in this Statement.

## **6.3. To delete your personal information**

You may request us to delete your personal information in the following circumstances:

- (a) If our processing of your personal information violates laws, administrative regulations or agreements with you;
- (b) If you no longer use our products or services, or you have cancelled your account;
- (c) If our processing purposes have been achieved, are unable to be achieved or that your personal information is no longer mandatory for achieving the processing purposes;
- (d) If we no longer provide you with products or services, or the retention period has expired;
- (e) If you withdraw your consent.

If you request to delete sensitive personal information based on the above circumstances, you may contact us at any time in the ways set out in this Statement, and we will reply within ten business days. When we delete your personal information from our service, we may not be able to delete the corresponding data in the backup system immediately due to technical reasons, but we will guarantee that the corresponding data in the backup system will not be used in daily business again or for other purposes, and that the data will be deleted in time when the backup is updated. Please be aware and understand that, according to laws and regulations, if the retention period specified by laws and administrative regulations has not expired, or that it is technically difficult to delete personal information, we will stop further processing except storing and adopting necessary security protection measures.

## **6.4 To withdraw your authorization and consent**

When we process your personal information based on your authorization and consent, you have the right to withdraw your authorization. In the case that a service requires your authorization to implement or operate normally, if you withdraw the relevant authorization, we can no longer provide you with the service or some functions of the service will be affected. If you want to withdraw your authorization and consent, you may contact us in the ways set out in this Statement. After you withdraw the relevant authorization, we will no longer process the corresponding data. Nevertheless, your withdrawal will not affect the previous processing of personal information based on your authorization.

## **6.5 To cancel your account**

You may cancel your previously registered account at any time, contact us in the ways specified in this Statement, and get help in account cancellation after identity verification.

After your account has been cancelled, we will stop providing you with products or services, and delete or anonymize your personal information upon your requirements and subject to the provisions of this Statement, unless otherwise provided by laws and regulations.

#### **6.6 To obtain a copy and portability of your personal information**

You have the right to obtain a copy of your personal information, please contact us in the ways specified in this Statement. Under the conditions stipulated by laws and regulations, you may also request us to transfer your personal information to other entities designated by you if technically feasible.

#### **6.7 Right to get interpretation**

You have the right to request us to explain the rules for processing personal information, please contact us in the ways specified in this Statement.

#### **6.8 To respond to your above requests**

You have the right to exercise your above-mentioned rights through online and offline contact channels. Please contact us via our customer service hotline 400-650-8626.

To ensure security, you may need to provide a written request or prove your identity in other ways, and we may ask you to verify your identity before processing your request.

We will reply within fifteen business days. If you are still not satisfied with the received response, you may file a customer complaint with the competent authority. If you have any questions, we will try our best to provide you with the information of the relevant authority based on the corresponding situation.

No fee will be charged for your reasonable request in principle, whereas a cost-based fee will be charged for repeated requests exceeding reasonable limits based on the circumstances. Those requests that are unreasonably repetitive, require excessive technical means (for example, developing new systems or fundamentally changing existing practices), bring risks to the legitimate rights and interests of others, or are very impractical (for example, involving data stored on backup tapes) may be refused.

We will not be able to respond to your requests in the following circumstances:

- (a) Those related to our fulfillment of obligations under laws and regulations;
- (b) Those directly related to national security and national defense security;
- (c) Those directly related to public safety, public health, and major public interests;
- (d) Those directly related to criminal investigation, prosecution, trial, and execution of judgments;
- (e) Those where we have sufficient evidence that you have subjective malice or abuse of rights;
- (f) The case of protecting the life, property and other major legal rights and interests of you or others, but difficult to obtain your personal consent;
- (g) The case that responding to your request will cause serious damage to the legitimate rights

and interests of you or other individuals or organizations;  
(h) Those involving trade secrets.

### **7. How we process children's personal information**

We will not knowingly solicit or collect personal information from children under the age of 14 without obtaining parental consent in accordance with applicable laws. If we discover that we have accidentally collected data of children under the age of 14, we will delete them from our records as soon as possible. We will not knowingly use children's personal information for any purpose, unless in order to provide products or services related to family or children.

### **8. How to update this statement**

We reserve the right to update this Statement at any time. The current version can be accessed via the relevant menu on the BMS (screen). For important updates, we will inform customers via mobile phone text message.

### **9. How to contact us**

If you have any questions or concerns about this Statement, or would like to complain about our possible violations of relevant laws and regulations, please contact us through customer service hotline 400-650-8626 or the contact person for user rights affairs through [data-protection@volkswagen.com.cn](mailto:data-protection@volkswagen.com.cn).

Bentley

Volkswagen Group Import Company Limited

## **My Bentley Services Notification and Consent Letter for Cross-border Transfer of Personal Information**

Update Date: Jan. 1 2025

Based on the needs of unified managing the import vehicles of the group and continuously providing vehicle services of the Bentley brand import vehicles to you, Volkswagen Group Import Company Limited (“we”) will transfer the following personal information of you to the recipient located outside of the People’s Republic of China.

**Please carefully read this *Bentley Services Notification and Consent Letter for Cross-border Transfer of Personal Information* (“Consent Letter”) and relevant information about the cross-border transfer as specified under this Consent Letter. If you refuse this Consent Letter, we will not be able to provide security verification for the activation of connected vehicles services and vehicle remote control services for you.**

**Types of Personal Information Transferred Overseas:** vehicle identification number (VIN)

**Purposes of the Processing Conducted by the Overseas Recipient:** provide security verification for the activation of connected vehicles services and vehicle remote control services for you.

**Method of Cross-border Transfer:** encrypted transfer via the special line.

**Method of Processing Conducted by the Overseas Recipient:** the overseas recipient receives the transferred data from us via the overseas system under its control, using the transferred data to provide security verification for the activation of connected vehicles services and vehicle remote control services.

**Safeguard of Personal Information Security:** before transferring your personal information overseas, we will fulfill our obligations in accordance with the laws and regulations, including but not limited to obtaining your separate consent in accordance with the laws, and adopting security encryption measures etc. Meanwhile, we will enter into necessary data protection agreement with the overseas recipient, requiring the overseas recipient to adopt sufficient technical and organizational measures to safeguard the security of your personal information, and ensuring your personal information receives the level of protection no lower than that in the People’s Republic of China.

### **Name of the Overseas Recipient and Contact Information:**

**Name: Volkswagen AG**

Address: Berliner Ring 2, 38440 Wolfsburg, Germany

Contact E-mail: [dataprivacy@volkswagen.de](mailto:dataprivacy@volkswagen.de)

If you would like to know more about how we protect your personal information when we transfer your personal information overseas, and how you exercise your rights as personal information subject, you may contact the overseas recipient by means provided under this Consent Letter. You may also directly contact us by calling our Client Service Hotline: 400-650-8626 or sending e-mail to: [mybentley@bentleymotorschina.com](mailto:mybentley@bentleymotorschina.com).

### **My Bentley Services Statement on the Processing of Sensitive Personal Information**

Release Date: Feb. 29 2024

Update Date: Jan. 1 2025

This Statement on the Processing of Sensitive Personal Information (hereinafter referred to as “**Statement**”) only applies to My Bentley services and aims to provide you with information regarding how Volkswagen Group Import Company Limited (“**VGIC**”), China Unicom Smart Connection Technology Co. Ltd (“**CUSC**”, together with VGIC, collectively referred as “**we**”, “**us**” or “**our**”) and our affiliated companies and our endorsed service providers process and protect your sensitive personal information when you use all or part of My Bentley Services.

Before using our services, please carefully read and fully understand the Statement and start using our services only after you confirm that you sufficiently understand and agree with this Statement.

This Statement aims to assist you to understand the following content:

1. How We Collect and Use Your Sensitive Personal Information
2. How We Retain and Protect Your Sensitive Personal Information
3. Means and Procedures for You to Exercise Your Rights Associated with Sensitive Personal Information
4. Others
5. How to Contact Us

### **1.How We Collect and Use Your Sensitive Personal Information**

We will evaluate the necessity of collecting and using your sensitive personal information in accordance with the requirements of relevant laws and regulations, informing the necessity and obtaining your separate consent by relevant policies and rules, page notification, interactive procedures, public notice and other proper means at an appropriate time, and will limit the impacts to the rights and interests of your sensitive personal information within the minimum scope.

We will abide by the principles of lawfulness, legitimacy, and necessity, collecting and using your sensitive personal information based on the following purposes, means and scope specified under this Statement. We will strictly follow the requirements of applicable laws, regulations and standards, and fulfill our legal obligations accordingly.

### **Registration and Activation of My Bentley Services**

In order to complete the registration of My Bentley Services account, we will collect and process your **ID card number (or passport number)** when you activate My Bentley Services.

According to laws and regulations of the People’s Republic of China, in order to complete the real-name authentication of SIM card, we will collect and process your **ID card number (or passport number) and dynamic portrait video**. If you refuse to provide such information, we will not be able to complete the real-name authentication of SIM car.

## Use My Bentley Services

### 1) Navigation Service

To provide you with online navigation and other location based services (including provide live road conditions, point of interest search, online map updates, satellite maps, personal navigation assistant, online search etc.), when you use the Bentley Multimedia System (“BMS”) navigation service pre-installed in your vehicle, we will collect and/or use your vehicle’s **current vehicle location** and **records of your call with the service answering specialist**. At the same time, we will share your **current vehicle location** with our third-party service provider with relevant surveying and mapping qualifications (i.e. AutoNavi Software Co., Ltd., contact information: Personal\_Information\_Officer@autonavi.com).

### 2) News, Weather

Each time you access this service, the following types of your data are collected and processed by us: your **vehicle location**.

### 3) Emergency Call

We collect and use your **vehicle location** during the emergency call services. In order to allow the emergency call center to use the last known location of the vehicle even when the current location cannot be identified, we will collect the **vehicle location** before the most recent engine shutdown even if no emergency call service is activated, and store it in the vehicle at all times. The emergency call center will **record the emergency call audio** and store the recording (to call back the vehicle and respond to possible issues) for a short period.

### 4) Roadside Assistance Call

When the roadside assistance call is activated, we will transfer your **user’s voice**. The personnel at the roadside assistance call center will communicate with you and record the **location** provided by you. If necessary, the roadside assistance call center will communicate orally to third-party service providers (such as towing companies) to provide these data. For documentation purposes, the call center only stores the conversation history after the call has been completed and the issue has been resolved. The roadside assistance call can be cancelled at any time.

### 5) Stolen Vehicle Locate (SVL)

In the event a vehicle is stolen and the theft is reported to the law enforcement agencies, the Bentley SVL Center of PATEO (hereinafter referred to as “**Service Center**”) will identify the **vehicle location** based on the request of the car owner, and provide such information to the law enforcement agencies solely for the purpose of locating and finding the vehicle. During a phone call with the Service Center, for documentation purposes and in case of potential dispute, the Service Center only stores the **conversation** and **location records** in associated with the incident, so that the police may retrieve the case.

### 6) My Bentley App

In order to provide you with a range of remote vehicle control services through My Bentley App, we will collect and use your **vehicle location**. For more detail about My Bentley App, please refer to My Bentley APP Privacy Statement.

## 7) Voice Dialogue

We collect and process **your voice information** and **vehicle location** only after you actively trigger the function. The voice dialogue system can be used online or offline.

The online voice dialogue system: **your voice information** and **vehicle location** are collected and transmitted to third-party service provider Shanghai Jidou Technology Co., Ltd. (company address is 3rd Floor, Building B, No. 58 Xiangke Road, Pudong New Area, Shanghai) and Volkswagen-Mobvoi (Beijing) Information Technology Co., Ltd. (company address is 3rd Floor, Block D, Jingyi Science and Technology Building, No. 9 Dazhongsi East Road, Haidian District, Beijing) for identification and processing, and will be deleted immediately after processing is completed.

## 2.How We Retain and Protect Your Sensitive Personal Information

Unless otherwise specified under this Statement, personal information collected by VGIC will be stored at a data center located in Beijing, PRC. VGIC have entrusted third-party service provider with relevant qualifications to provide technical support, and we have adopted strict physical security, IT security, and access control measures to protect your personal information.

VGIC and its affiliates will only retain users' personal information for the period of time as long as necessary to fulfil the purposes mentioned above, or for the purposes of complying with legal or audit requirements. When we no longer need to use users' personal information, we will remove it from our systems and records, or take steps to properly anonymize such data, so that users can no longer be identified (unless we need to retain your information to comply with legal or regulatory obligations of VGIC or its affiliates).

Ensuring the security of personal information is a high priority for us. Thus, we use up-to-date technical and organisational measures. Our security measures include (but not limited to) access control, system hardening, network vulnerability scan and management, security awareness training, logging and security incident management, transmission and storage encryption.

In case of a personal information security incident, we will investigate according to internally developed emergency plan, take all necessary measures to eliminate potential risks, and notify you in accordance with relevant laws and regulations. At the same time, we will also proactively report the processing of personal information security incidents pursuant to the requirements of the regulatory authorities.

However, if information is transmitted via the Internet as part of My Bentley Services, the security of these data cannot be guaranteed. You should also understand that there may be circumstances amount to force majeure which cannot be foreseen, avoided or overcome by VGIC or its affiliates, and user's personal information may still be disclosed, destroyed, tampered with, lost, improperly used or otherwise illegally used. In such circumstances we will inform the affected users or publish relevant details in accordance with applicable law and regulation.

### **3. Means and Procedures for You to Exercise Your rights Associated with Sensitive Personal Information**

In accordance with relevant laws, regulations and standards that are currently effective, as well as industry practices, we safeguard your exercise of relevant rights on your sensitive personal information. Detailed means and procedures for exercising the above-mentioned rights please refer to Personal Information Protection Statement for My Bentley Services.

### **4.Others**

The Statement provides supplementary rules to the Personal Information Protection Statement for My Bentley Services. For matters not mentioned under this Statement, please refer to the Personal Information Protection Statement for My Bentley Services.

### **5.How to Contact Us**

If you have any questions, opinion or suggestion regarding this Statement, or if you have any complain about our possible violations of relevant laws and regulations please contact us by the following means:

- Customer Hotline: 400-650-8626;
- Contact Person for User Rights Affairs: [data-protection@volkswagen.com.cn](mailto:data-protection@volkswagen.com.cn)