

## **Mercedes-Benz Canada Inc. Privacy Notice for the Mercedes me connect Services**

When you purchased or leased your model year 2019 or newer Mercedes-Benz vehicle, you became eligible to subscribe to our connected vehicle services which are collectively named **Mercedes me connect**. Mercedes me connect unlocks access to a package of innovative services, products, and lifestyle offers from Mercedes-Benz Canada Inc (“MB Canada”) and our cooperation partners – including, but not limited to, parking assist, live navigation assistance, integration of popular mobile apps and emergency services at the push of a button, remote access to your vehicle to start and lock/unlock your vehicle, remote access to vehicle maintenance and much more.

At MB Canada, protecting your privacy is very important to us and we want you to feel comfortable using our connected vehicle services. This Privacy Notice explains our practices regarding the collection, use, and sharing of information that is collected, generated, recorded, used, disclosed or stored when you use our Mercedes me connect services (“Connected Vehicle Information”).

When you use a vehicle with Mercedes me connect convenience services and safety and security services, which include emergency crash notification, airbag deployment notification, and stolen vehicle location, we and our service partners collect certain information, which includes geolocation information and driver behaviour information as described below. How we use your information will depend on which services you use, how you use those services, and the choices you make in your settings.

*Even if you have not activated Mercedes me connect services, your vehicle may collect and transmit geolocation information and driver behaviour information in a collision or potential emergency. See your vehicle’s Operator’s Manual for more information.*

By purchasing or using a vehicle equipped with Mercedes me connect services, using Mercedes me connect services, subscribing to Mercedes me connect services, or creating a Mercedes me account, you consent to the practices described in this Privacy Notice. With certain exceptions, you are free to withdraw your consent at any time. See the section below “Your Choices” for more information.

This Privacy Notice does **not** address the collection, use, or sharing of information regarding how you use or interact with our websites or our mobile application (“App”). Please see our website Privacy Policy at <https://www.mercedes-benz.ca/en/legal-notices/privacy-policy> or the Mercedes me connect 2019 + App privacy statement (available in the App itself) for information related to those services.

Please also note that this Privacy Notice supplements our general Privacy Policy, which can be found at <https://www.mercedes-benz.ca/en/legal-notices/privacy-policy> and explains how we handle your personal information more generally when you interact with us.

### **Personal information**

Personal information is information relating to an identified or identifiable natural person, for example, your name or your personal contact details, as well as other information with which you can be identified directly or indirectly. In the context of your connected vehicle, it can include things like driver behaviour, location

information about the vehicle, information about the use of the Mercedes me connect services, or other information a person generates by using the vehicle or the Mercedes me connect services.

## The Information We Collect

We collect a variety of information when you use your connected vehicle and the Mercedes me services. This information falls into the general categories below:

- **Driver Behaviour Information:** Information about how you drive your vehicle, such as vehicle speed, seat belt use, acceleration, trip duration, and braking habits.
- **Geolocation Information:** Information about the precise geographic location of your vehicle.
- **Account Information:** Information that you may provide when you subscribe to or register for Mercedes me connect, such as name, address, payment information, telephone number, personal email address, language preferences, subscriptions, and other personal information that you may choose to share with us so that we can provide the Mercedes me connect services and communicate with you.
- **Vehicle Data:** Data about your vehicle, including data generated by the sensors and software in your vehicle, such as diagnostic trouble codes, maintenance conditions, engine performance, system temperatures, mileage, tire pressure, fuel level, door and window status, sensor status, climate control settings, charging status, charger type, battery status, impact data, and fuel economy. Vehicle data may include your vehicle's VIN, Driver Behaviour Information and Geolocation Information. Vehicle Data may also include voice recordings made to support voice-activated services.
- **System Information:** Information about how you interact with vehicle systems, including use of multimedia screens, recent service requests, presets and other settings or selections in the vehicle.
- **Service-Related Information:** Information related to the availability, use of, or access to Mercedes me connect services and features, including charging station information, your chosen routes, calendar entries, contact numbers, points of interest, eligibility for services, available parking spaces, information requests, traffic information, hazard information, service activation requests, and credentials for multimedia services.

We may collect the above information remotely and/or at regular intervals while your vehicle is in use.

## How the Information is Used

We are committed to using the information we collect only in ways that are consistent with the context in which we collected the information and consistent with the choices that you make, including in the following ways and for the following purposes below:

**Account Information:** We use this information (often in combination with other information) to, among other things, provide the Mercedes me connect services that you activate or request and to communicate with you regarding your Mercedes me connect services and your vehicle. If you have provided payment card information, we will use that to process transactions.

**Driving Behaviour Information:** We may use Driving Behaviour Information for the general purposes described herein. In addition, some specific Mercedes me connect services may involve the use of Driving Behaviour Information.

**Geolocation Data:** We use the Geolocation Information to provide emergency response or breakdown services, to provide navigation services and help you find destinations that you are looking for. In addition, some Mercedes me connect services are primarily location-based. Live Traffic, navigation-related Services, Concierge, Car-to-X communications, Assist Services, Parked Vehicle Locator, Vehicle Tracker, Geofencing, Route Planning, Valet Protect, Mercedes-Benz Apps, and Product Improvement services, for example, involve the collection of Geolocation Information to determine the location of your vehicle.

**Vehicle Data:** We use this information to, among other things, remotely diagnose your vehicle, assist with maintenance needs, and confirm vehicle quality. Voice data may be used to manage the activated services that use voice commands.

**System Information:** We use this information to, among other things, learn how you and others interact with the vehicle and its systems.

**Service-Related Information:** We use this information to, among other things, help you manage your vehicle service and maintenance, confirm vehicle quality, and activate remote services that you elect to receive.

We use the information above more generally to improve vehicle safety, develop new and better vehicles, improve our Mercedes me connect services and other services, and analyse vehicle trends.

We may also use this information to conduct marketing, including interest-based marketing and advertising for us and on behalf of third parties (subject to any required consents). Occasionally, we will need to protect our, and our affiliates', rights or business interests and we may also use it for those purposes.

We may also use the information we collect consistent with your authorization or consent.

## **Information Sharing**

In order to provide you with Mercedes me connect services, we may share or transfer your information with others who process it on our behalf (in which case, they may only use it for the purposes you have consented to, and we pass that restriction along to them).

If you have allowed us to do so, we may disclose your information to others, who can use the information for the purposes to which you have agreed with them (as such purposes are disclosed in their privacy notice if you have consented to it or how you have otherwise agreed with them they can use it).

When we share or transfer your information to third-party service providers acting on our behalf, we contractually require them to handle the information they receive in accordance with this Privacy Notice. Examples of such transfers to third parties include transfers to:

- Our business partners that may provide you with services (e.g., SiriusXM)
- Your Mercedes-Benz dealer (e.g., to inform them that you have activated the services)
- Our parent company Daimler AG and our affiliates
- Our third-party content providers, which may provide you with the information or services you request. For example, we may share information that does not reasonably identify you or your vehicle with third parties that provide traffic or other location-based information or services.

Where you have authorized us to do so, we may disclose your information to other parties for their use, primarily so that they can provide their services to you. For instance, if you wish to activate services provided by a third party, you may authorize us to disclose information we collect to that third party, consistent with your authorization or consent. You may also be asked to rate a service provided by a third party; your anonymous rating will be shared with that service provider.

We may also disclose your information to emergency and roadside assistance providers (e.g., roadside assistance services and 911 emergency response), and with law enforcement if you have requested the stolen vehicle location assistance service.

We may also disclose your information, including some Geolocation Information, to Mercedes-Benz Financial Services Canada, which will use the information subject to its own privacy statements, which may include verifying fraud or repossessing the vehicle in the event of a breach of your lease or finance agreement and to support vehicle recovery.

Additionally, we may also disclose your information to comply with the law; to respond to claims; to comply with legal process served on MB Canada or our parent company Daimler AG (e.g., a lawful subpoena, warrant, or court order); to enforce or apply our policies or agreements (including to bill and collect payments); to protect and defend our rights or property or that of Daimler AG, our affiliates, dealers, customers, employees, visitors, or the public; in connection with a business transfer, sale, liquidation, or merger; and if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure; or as otherwise required or permitted by law.

*Geolocation Information:* We may share or disclose Geolocation Information to support location-based services, such as Live Traffic, Navigation, Tracking, Concierge, Car-to-X communications, Vehicle Monitoring, Assist Services, and Product Improvement services. When you sign up for these or other services, you may receive additional information about how we share Geolocation Information in association with the specific services.

*Driving Behavior Information:* We may share or disclose Driving Behavior Information to support the provision of services, such as Tracking Services, Vehicle Monitoring, and Product Improvement services. When you sign up for these services, you may receive additional information about how we share Driving Behavior Information in association with the specific services.

Please note that certain services may involve the sharing of information, including Geolocation Information and Driving Behavior Information, with authorized users of your Mercedes me connect services (e.g., household members). For example, authorized users can view Geolocation Information and Driving Behavior Information when Tracking Services and Vehicle Monitoring are active. Please review applicable service descriptions for more information.

Personal profiles established your user account may be available to other users of your vehicle. To delete profiles from your vehicle, you may need to delete the profile within the Mercedes me connect Customer Portal as well as within the vehicle.

We may also provide aggregated data about our Mercedes me connected subscribers and related telematics service information to third parties but these statistics will not include information that can reasonably identify you or your vehicle.

## **Your Choices**

Withdraw your consent or opt-out of the collection of personal information.

You can withdraw your consent to the collection of your personal information, subject to legal or contractual restrictions, via the Mercedes me connect portal and following the instructions there. You may also be able to deactivate specific services via the Mercedes me connect portal. You can contact Mercedes me connect Support for additional information on how to opt out of data collection or deactivate services: 1-800-387-0100 or [can.enquiries@cac.mercedes-benz.com](mailto:can.enquiries@cac.mercedes-benz.com). Please note that opting out of the collection of your personal information may disrupt or disable certain Mercedes me connect services.

## **Review and Update**

You may request to review and update or correct your personal information at any time by emailing us at [PrivacyOfficer@Mercedes-Benz.ca](mailto:PrivacyOfficer@Mercedes-Benz.ca)

## **Deletion of Data**

You can delete Geolocation Information used for Parked Vehicle Locator, Vehicle Tracker, Geofencing, Last Mile Navigation, Trip Statistics, Travel Time Forecast, Park Service Tracking, and Notification of Speed Limit Violation by deactivating the services. To deactivate certain location-based services, you may need to contact the CAC without using your vehicle's communications features. This prevents unauthorized disabling of location services.

## **Security and Data Storage**

We endeavor to protect the data we collect. We use commercially reasonable physical, technical, and administrative security measures designed to protect information against loss and unauthorized access or use. Please note, however, that no information system is 100% secure and we cannot guarantee the security of your information.

We retain the information we collect for as long as reasonably necessary to provide services and fulfil the purposes described in this Privacy Notice, after which point such information will be deleted or de-identified, subject to any legal or contractual restrictions which may require us to keep certain information longer.

## **Security Safeguards**

Just as with other personal information you provide to us, the information we collect via the Mercedes me connected services is protected against loss, theft, and unauthorized access, disclosure, copying, use, or modification with security safeguards appropriate to the sensitivity of the personal information. We protect personal information regardless of the format in which it is held. For more information on how we protect personal information, please see MB Canada's Privacy Policy at <https://www.mercedes-benz.ca/en/legal-notice/privacy-policy>.

## **Information outside Canada**

Please note that personal information may be stored and processed in any country where MB Canada or its affiliates are located, or engages service providers. Those countries may not have the same data protection laws as Canada. When we transfer information from or about you or your use of our products or the services to other countries, we will protect it as described in our Privacy Policy. By using our products, the services, or otherwise providing information to us, customers consent to the transfer of their personal information to countries outside of Canada.

## **Changes to this Privacy Notice**

We may amend or update this Privacy Notice from time to time. In such event, we will post the revised Privacy Notice at this location. In some circumstances, we may take reasonable steps to alert vehicle owners and registered users prior to the change.

## **Contact Us**

Individuals may direct inquiries, comments or complaints by submitting them in writing to the MB Canada Privacy Officer at:

By mail:  
Privacy Officer  
98 Vanderhoof Ave  
Toronto, ON M4G 4C9

By email: [PrivacyOfficer@Mercedes-Benz.ca](mailto:PrivacyOfficer@Mercedes-Benz.ca)

Customers may also make inquiries by calling us at 1-800-387-0100.

The MB Canada Privacy Officer reviews all complaints within 5 business days. If a complaint is found to be justified, our Privacy Officer will conduct an investigation and take appropriate measures to remediate the issue, including, if necessary, amending our policies and procedures, safeguards, and information management practices. The MB Canada Privacy Officer will inform the complainant of the results of the investigation within 30 business days from the receipt of the complaint. When investigations require more time in order to thoroughly review the issue, our Privacy Officer will provide the complainant with a timeline for completion of the investigation.

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