

**InControl Privacy Policy**  
**Last updated: 13 October 2019**

**WHAT YOU CAN EXPECT TO SEE FROM READING THIS PRIVACY POLICY**

Jaguar Land Rover is one of the world's leading producers of premium cars. Innovation and design give our customers experiences they love for life – anticipating and exceeding their needs and expectations. Quality and excellence are our hallmarks. Taking care of our customers is paramount.

We respect the privacy of every individual whose information we process. This Privacy Policy explains how we use personal data received from your use of the My InControl Services, and use of our vehicles (referred to as 'vehicles' throughout this Privacy Policy), products and services, and informs you of your data protection rights.

**DATA PROTECTION INFORMATION**

**1. DATA CONTROLLER INFORMATION: WHO WE ARE AND HOW TO CONTACT US**

**Who We Are:** When we refer to 'Jaguar Land Rover', 'JLR' 'we', 'our' or 'us' in this Privacy Policy, we refer to: Jaguar Land Rover Limited, whose registered office is at: Abbey Road, Whitley, Coventry, CV3 4LF, England, and whose registered number is: 1672070.

If you want to find out more about the Jaguar Land Rover group, please have a look at the "Tell me more" box below.

**Customer Relationship Centre contact details:** For any queries relating to this Privacy Policy or the products and services included with it, you can email us using the following email address: [jlr-euro-importer-customer-relations@jaguarlandrover.com](mailto:jlr-euro-importer-customer-relations@jaguarlandrover.com).

**TELL ME MORE ...**

**... about the JAGUAR LAND ROVER Group ...**

Jaguar Land Rover is part of a group of companies whose parent company is Jaguar Land Rover Automotive plc. You can find out more corporate information about Jaguar Land Rover on our website at: <https://www.jaguarlandrover.com/>.

Jaguar Land Rover is part of the Tata group. More information about the Tata group and the Tata companies can be found here: [http://www.tata.com/aboutus/sub\\_index/Leadership-with-trust](http://www.tata.com/aboutus/sub_index/Leadership-with-trust) and <http://www.tata.com/company/index/Tata-companies>

**2. WHAT THIS PRIVACY POLICY APPLIES TO**

- This Privacy Policy will apply to your use of:

- the mobile phone application (“**InControl Remote App**”) that you have downloaded from the Online Store onto your mobile telephone or handheld device (“**Device**”) which enables you to use the ‘Remote Essentials’ features and, depending on your subscription, the ‘Remote / Remote Premium’ features;
- the My InControl website from which you can access your InControl Services account and access certain InControl Services;
- any of the following “InControl” services (depending on your vehicle model and subscription): (i) the services provided via the InControl Remote App and the My InControl website; (ii) the “SOS Emergency Call” services; (iii) the “Optimised Roadside Assistance” services; (iv) “InControl Secure Tracker / Secure Tracker Pro” services; and (v) any linked or InControl available apps and services (“**InControl Services**”);
- the Infotainment system, including the InControl Touch Pro and Pivi Pro Features; (The use of the word “Features” in this Privacy Policy applies to vehicles equipped with InControl TouchPro or Pivi Pro and covers the infotainment, connected services and software update features and the “Live” services (including all software, images, text, data and other content forming part of or relating to those features); and
- other connected vehicle systems and services.

Please note that this Privacy Policy does not apply to third party websites which you may access in connection with your use of the InControl Services or otherwise, or to services or features which you sign up to receive directly with a third party – please refer in these cases to the relevant third party’s privacy policy.

This Privacy Policy sets out the basis on which data, including any personal data we collect from you, or that you provide to us, will be processed by us, following your use of the My InControl website, or our vehicles, products and services described in this Section 2. Please read it carefully to understand our practices regarding data collection and your personal data and how we will treat it.

Please be aware that it is your responsibility to alert all passengers and people you authorise to use your vehicle, the infotainment system and/or the InControl Services about the privacy practices described in this Privacy Policy (including the ways in which we may collect and use data from the vehicle and/or relating to users of the vehicle).

### 3. THE TYPES OF INFORMATION WE COLLECT

We may collect and process the following data about you and/or your vehicle(s):

- **Submitted Information:** information that you provide by filling in online forms during the setup of your InControl Services account, or during your use of the My InControl website and InControl Services, via your use of your vehicle’s infotainment system, information which you may otherwise provide to us directly (for example, when you communicate to us via telephone or email or through one of the My InControl website forms), or that which the authorised retailer (from whom you purchased or leased the vehicle) provides on your behalf when setting up your InControl Services account, or otherwise in

connection with, or following up on, any other communication with you. This information will depend on the nature of your actions, but may include your name, address, telephone number (including mobile number), e-mail address, language preference, password and PINs for your InControl Services account, your vehicle infotainment choices and preferences, and information about your preferred authorised retailer(s).

- **Additional Information:**

- if you contact us, we may keep a record of that correspondence; and
- details of transactions you carry out through the My InControl website.

- **Device Information (including location):** We may collect information about the Device or any computer you may use to access our websites, or download a copy of the InControl Remote App onto your smartphone Device, including the operating system and version, the InControl Remote App installation unique identifier, the Device's locale settings and country code. The InControl Remote App may also collect information about the location of your device and tokens and username for identification, but this information will not be transmitted to us. The consents you provide to download the InControl Remote App includes consent for use of GPS or location data for app services, including map information. You can restrict the access to, or collection of, your Device's location by disabling the location features of your Device or by not using the features of the device that require location information. Please note, this may have an impact on the InControl Remote App services that are available to you. More information on Device data, automated data collection and cookies can be found in our Cookies policy below.

- **Vehicle Identification Information:** information about the vehicle(s) that you have registered to the InControl Services or such other vehicle that is otherwise identified to us (for example, via a retailer) as connected with you, including the Vehicle Identification Number (VIN), the make, model, model year, features, registration number, date of purchase or lease, and the authorised retailer from whom you purchased or leased the vehicle.

- **Location Information:** In order to provide you with the InControl Services it is necessary for us and our service providers to make use of location data sent from your vehicle, including information about its last parked location. We will also collect and process other location information about the vehicle at any point in time as part of the "journey tracking" function ("**Journeys**") of the InControl Services. The information that we will collect and process as part of this function is set out in "Journey Information" below. The last parked location of the vehicle will always be tracked and cannot be switched off for the period you receive InControl Services. Subject to this, you are able to switch off Journeys at any time via the My InControl website and the InControl Remote App. If, however, the "SOS Emergency Call", the "Optimised Assistance" or the "InControl Secure Tracker / Secure Tracker Pro" function is activated, real-time location data relating to the vehicle will be activated automatically upon occurrence of a relevant trigger event, such as your vehicle being towed away with the ignition off, moved in a way that triggers "InControl Secure Tracker / Secure Tracker Pro" or the deployment of your vehicle's airbags respectively, and sent to the relevant service provider and/or emergency services (as appropriate) even if you have switched off Journeys. For full details of the relevant trigger events please refer to the vehicle handbook. Location Information is also necessary (separate to

“Journey Information” functionality), for use of service functionality including: locating your vehicle on a map and getting walking directions back to it, and locating your vehicle in a crowded car park with the ‘beep and flash’ functionality. **Even if you have not activated your InControl Services account, the vehicle may automatically initiate a call to contact emergency services via the limited emergency call function or you may be able to manually initiate a voice call for emergency services via the limited emergency call function. The occurrence of such a call may transmit information, including vehicle location, time, and a vehicle identifier to us and/or our emergency service providers.**

- **Journey Information:** information about your journey sent from your vehicle including the journey distance, real-time location, the duration of the journey, the average speed and data about the efficiency of the journey. As referred to above, you can turn off Journeys via the My InControl website and the InControl Remote App. This will prevent any of the above information from being sent from the vehicle (except for the last parked location). As stated above, if, however, the “SOS Emergency Call”, the “Optimised Roadside Assistance” or the “InControl Secure Tracker / Secure Tracker Pro” function is activated, location data of the vehicle will be sent to the relevant service provider and/or the emergency services (as appropriate) even if you have switched off Journeys.
- **Vehicle Operation Information:** this includes information relating to the vehicle being involved in an accident such as the fact that the airbags have been deployed or the sensors have been activated. We will also collect and process other information about the operation of the vehicle throughout the course of its day-to-day use, including, but not limited to, the fuel amount, the distance to empty status, the odometer value, the distance to service status, the coolant level, the washer fluid level, the brake fluid status, the brake pad wear, the tyre pressure, tyre pressure sensor failure, engine malfunction, the oil level, the door and window status, if seatbelts are buckled or not, and information from any sensors, for example in the car, on the steering wheel, or from camera information, including if the cab is open, boot open, bonnet open status, battery information including voltage, emissions information and whether the alarm is armed or sounding.
- **Log information:** For the purpose of this Privacy Policy, “**log information**” refers to the log files listing actions or requests made to our systems in connection with your usage of the infotainment unit, InControl Services, the InControl Remote App and InControl websites. We will automatically collect and store information related to “SOS Emergency Call” and “Optimised Roadside Assistance” calls made from the vehicle (including the date, time duration, content of the call and number of calls made) (“**Call Log Information**”), use made of this data is detailed below. When you access the My InControl website, use the infotainment system, or connected features, connect a SIM card, or pair a device, we may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps (“**Website Log Information**”). We may also collect and store information related to your usage of the InControl Remote App services and vehicle status messages sent by your vehicle to the InControl Remote App (“**App Log Information**”) and from your use of the vehicle’s Infotainment system, plugged in SIM card or paired device (“**Device Information**”).
- **Security Authentication:** Vehicle identification data and authentication tokens.

- **“Live” information:** feature specific information such as favourites, emails, notes, media, and information you choose to submit to the Live Features you use; content feed usage-related information; user settings such as activation of ‘remember me’ function; security authentication data; localisation information such as time zone, language and country; vehicle make and brand, and relevant Log Information.
- **‘Remember me’ and ‘Remember Pin’ functions:** Your vehicle may have a ‘remember me’ or ‘remember Pin’ function for certain features of the InControl Package. This function, if you choose to enable it, enables you to remain automatically logged in on the vehicle for more convenient access to the features. Please be aware that while this function is active any other person using the vehicle will be able to access any of your stored settings, Live Features and personal details in the vehicle and to use the InControl Services in the vehicle as if they were you. If you do not wish other users to have access, it is your responsibility to ensure the ‘remember me’ or ‘remember Pin’ function is disabled and to log-out from the relevant features.
- **Marketing data:** We may receive from you direct, or receive from retailers or other third party partners, your contact details, marketing preferences or other information, where there is appropriate notice and in compliance with applicable data protection laws. You have the right to ask us not to use your personal data for marketing purposes. Please see your data protection rights at Section 9 (Your data protection rights) below for further information on these.
- **Public sources of data:** We may use public sources of data, for example, to support functionality or services (e.g. to support authenticate or fraud checks), and/or to maintain the accuracy of the data we hold. For example, we may make checks from time to time with the National Vehicle Driver File (NVDF) to check our vehicle owner information remains up to date.
- **Third party data:** We may receive data from third parties in the ways we explain in Section 5 below.
- **Infotainment System Features and Software Updates:** We may use held data (such as VIN) to record preference choices, to support with our provision of Software Updates, and to deal with queries and any necessary business requirements in connection with provision of Software Updates.

Please be aware, we may associate Submitted Information with the other information detailed above, and where we do so, we will treat the combined information as personal data in accordance with this Privacy Policy for as long as it is combined.

#### 4. HOW WE USE VEHICLE DATA AND YOUR PERSONAL DATA.

We use vehicle data and personal data to manage and meet service requirements and information requests, to understand service, vehicle and InControl Remote App use, for internal research and development purposes, and to make our products and services as effective as possible. For more information on our processing, and the legal grounds that are relevant, please see the “Tell me more” box below.

**TELL ME MORE ...**

The main uses of your personal data and the legal grounds we rely on for these are:

<b>Activity:</b>	<b>Applicable Legal grounds:</b>
<p><b>Supporting your requests and enhancing your website and infotainment experiences</b></p> <p>Personal data and vehicle information is processed in order to set up your accounts and subscriptions, in connection with subscription renewals, in your ongoing use of the services described in Section 2 and to send you relevant service, account or subscription information, including relevant Feature information (e.g. about updates to the Features) and/or about any updates to the services (for example, information about any updates to the InControl Services, the InControl Remote App or Software Updates).</p> <p>Personal data and vehicle information will also be used to enhance and simplify your digital experience across Jaguar Land Rover websites, in-vehicle experiences, and supporting your use of personalised website areas, including processing in your access and use of the 'Customer Portal' and in your single sign on authentication journeys.</p>	<p>Legitimate Interests in running effective website and in-vehicle services.</p> <p>Necessary for contract.</p> <p>Where personal data is required for entering into a contract, we will identify to you where information is mandatory. The consequences of not providing this information may include being unable to proceed with the requested service.</p>
<p><b>Vehicle services, and internal research and development (see box below for the latter)</b></p> <p>Submitted Information, Vehicle Identification Information, Location Information, Journey Information, Vehicle Operation Information and your personal data will be processed in order to enable your use of the available Features, provide available vehicle and InControl Services to you, (including but not limited to Software Updates), to maintain and improve the quality of our vehicle services and the InControl Services and to improve our customer service.</p> <p>We will also use this information to assist in resolving any technical issues with the InControl Services and to enhance your experience of the InControl Services.</p> <p>We will use the Vehicle Operation Information to support internal research and development (see below), to assess our</p>	<p>Necessary for contract.</p> <p>Legitimate Interests in maintaining effective vehicle services.</p> <p>(For Marketing activities processing grounds, please see below).</p> <p>Where personal data is required for entering into a contract, we will identify to you where information is mandatory. The consequences of not providing this information may include being unable to proceed with the requested service.</p>

<p>wider understanding of vehicle performance, to support future performance developments on a fleet wide or vehicle model basis, to verify changes to your vehicle's ownership, as well as to assess specific issues, and aid in diagnostics and servicing, in relation to the vehicle and this may include sending you notifications by email or SMS, in accordance with our legitimate interests and your preferences.</p> <p>You have choice and control in Vehicle Data Sharing (VDS), this is switched off as default. Switching it on will share vehicle data with us to help us develop and improve our vehicles, products and services.</p> <p>Vehicle location data will be processed as necessary for operation of Features where applicable such as navigation, traffic, and provision of Software Updates.</p>	
<p><b>Internal research and development</b></p> <p>For internal research, development, analytics, analysis and reporting purposes, e.g. to monitor and assess vehicle performance, predict trends or performance, develop new functions, products and services, or to evidence compliance with regulatory requirements.</p> <p>We will only use personal data where identified to be necessary for internal research and development purposes. Where it is possible, we will use anonymised information to produce statistical analysis of the InControl Services to enable us to improve our product and overall customer service.</p>	<p>Legitimate Interests in assessing and improving performance, managing compliance, monitoring trends and developing new products.</p>
<p><b>Resolving your queries, managing your transactions and continuing to improve our services</b></p> <p>Your personal data (including the Additional Information) will be processed when you contact us and as applicable in order to help resolve your queries or complaints, to help to resolve any issues with the Features or InControl Services, to improve our customer service, and to manage your transactions via the My InControl website. We may record calls for training and quality purposes and to help resolve disputes.</p>	<p>Legitimate Interests in responding to your queries and running effective website services.</p>

<p><b>Enhancing website experience</b></p> <p>Where we pre-fill website data fields to enhance and streamline your online experience.</p>	<p>Legitimate Interests in enhancing, simplifying and streamlining website experiences.</p>
<p><b>Supporting in-app features and processing data for logging and analytics purposes</b></p> <p>Device information and personal data is processed in order to provide you with the best service (for example, to detect screen size to fit the device you are accessing the service on) and to support issue resolution for any queries you raise or feedback you share with us (including the InControl Remote App feedback feature). It also supports our internal analytics, investigation of system or service issues and anonymised statistical analysis to help develop the Features and our products. More information about device data can be found in our Cookies Policy below.</p>	<p>Legitimate Interests to resolve reported issues, assess received feedback and internal analytics to improve and better understand services and products and service and product use, website and app functionality.</p>
<p><b>Supporting applicable vehicle services</b></p> <p>We and/or our service providers make use of certain information you submit or which is sent to or from your vehicle for and in connection with the provision of the Features. For third party data uses, these can be found detailed in third party or Feature specific end-user terms and privacy policies which are accessible from third party own websites, and in certain cases where referred to in clause 1 of the InControl Touch Pro and Pivi Pro Feature Terms.</p> <p><b>“Live” Information:</b> where available for your vehicle, this information is stored on the vehicle and transferred to our service providers as necessary to facilitate the service, enable secure access to and download of Live Features from our service provider(s), and to store your settings, data and content relating to Live Features.</p>	<p>Necessary for contract</p> <p>Legitimate Interests in maintaining effective vehicle services.</p> <p>Where personal data is required for entering into a contract, we will identify to you where information is mandatory. The consequences of not providing this information may include being unable to proceed with the requested service.</p>
<p><b>Marketing activities</b></p> <p>We will obtain your consent where required by law:</p>	<p>Consent</p> <p>Note: Where we collect your personal data with consent, you may withdraw</p>

<p>a) in order to send market communications to you including by electronic means (e.g. email, text etc.), related to products or services different from those previously contracted by you; and</p> <p>b) where we share your details with our network of independent third parties, for sending marketing communications, including by electronic means. We will also comply with our cookie obligations where we use cookies on our websites.</p> <p>Other marketing activities, except where local law requires consent, will happen assessed on the Legitimate Interests ground. e.g. where we tailor marketing communications or send targeted marketing messages, via channels such as post, phone, app or social media and other third party platforms; and in messages that provide existing customers with information about similar products and services (these may be sent by electronic means). In order to improve the services we offer via our websites, we may ask you to participate in research from time to time. It is entirely up to you whether you choose to do so.</p> <p>We will use profiling and carry out research and analytics activities to inform our marketing strategies, to create a better understanding of our customers and visitors; to support our website advertising, and to better improve the website information, functionality and the services we provide.</p>	<p>your consent for us to use your information in any of these ways at any time. Please see Withdrawing your consent in Section 9 below for further details. (This right doesn't affect the lawfulness of processing that was based on that consent before its withdrawal.)</p> <p>Legitimate Interests for direct marketing purposes</p> <p>Legitimate Interests to better understand our customers and improve our services</p>
<p><b>Records maintenance and general administration</b></p> <p>To maintain our records, administer and maintain our services, apps, websites, and in-vehicle functionality, to support your queries and any other internal operations and administrative purposes (for example, this will include troubleshooting, testing, supporting our audit requirements and in responding to any enquiries you may make, including any data protection rights you raise).</p> <p>We may record calls with you for training and quality purposes and to help resolve disputes.</p> <p>Specifically we will use Log Information (as explained above) in the following ways:</p>	<p>Necessary for contract</p> <p>Legitimate Interests in maintaining appropriate websites, records and service administration</p>

<b>Ways we use Log Information:</b>	<b>Types of Log Information this uses:</b>	
For providing services to you.	Call Log Information	
To investigate system issues, including potential misuse of the InControl Services.	Call Log Information	
For website/app logging and to investigate website/system issues.	Website and App Logs Information about your usage of the My InControl website and InControl Remote App	
To improve our operational processes regarding our SOS Emergency call, Optimised Roadside Assistance, InControl Secure Tracker / Secure Tracker Pro and Live services.	Call Log Information (where possible we will take steps to anonymise, pseudonymise and/or aggregate the Call Log Information used)	
For analytics purposes, to maintain and improve the quality of the services and features, including InControl Services and InControl Remote App services, and to improve the customer experience on our vehicle functionality, websites and apps.	Website and App Logs Information (where possible we will take steps to anonymise, or pseudonymise and/or aggregate the Log Information used)	
<p><b>Network and information security</b></p> <p>To maintain our network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access. And to maintain</p>	<p>Necessary for contract</p> <p>Legitimate Interests as appropriate for ensuring network and information security</p>	

<p>appropriate server locations (for example, we may work with third parties to support appropriate use of cloud services).</p> <p>We use Security and Authentication information to support our services including InControl services. (Authentication data is used for log-in to your accounts with us and for security when you use the Features and with the purpose of preventing unauthorised access). This is automatically communicated between our providers of security authentication and hosting services in order to verify identity and prevent unauthorised use of our services including InControl Services.</p>	
<p><b>Corporate acquisitions and disposals</b></p> <p>Any data processed as is necessary in the context of corporate acquisitions or disposals</p>	<p>Legitimate business Interests</p> <p>Legal Obligation</p>
<p><b>Management of legal and regulatory requirements</b></p> <p>To manage legal and regulatory requests and requirements, meet or defend legal rights or for the prevention/detection of crime, (including where required to assist the Office of the Revenue Commissioners, law enforcement agencies such as An Garda Síochána, the NVDF or any other public authority or criminal investigation body, or for the safeguarding of national security).</p>	<p>Legitimate Interests in complying with law and regulation, including responding to regulators</p> <p>Legal Obligation</p>
<p><b>Service communications</b></p> <p>In the event we communicate to you an urgent safety or product recall notice.</p> <p>General service information</p>	<p>Vital interests</p> <p>Legal Obligation</p> <p>Necessary for contract</p> <p>Legitimate interests in running effective services</p>

## 5. WHO WE SHARE PERSONAL DATA WITH

We may share your personal data with (and may receive information about you and your vehicle(s) from):

- Those third parties who need to handle it, including suppliers (see more information below), third party app, navigation and other Feature providers and service providers for vehicle related services (including but not limited to finance, insurance, warranty, lease/hire), and InControl service providers, so we can provide to you the products and services you are eligible for, have signed up to or requested, or that are appropriate for your vehicle, for example, InControl or vehicle available services, or Software Updates.
- For the purposes of providing the InControl Services to you: our telematics service provider, the emergency services, our roadside assistance provider, our stolen vehicle tracking provider, local authorities, our providers of hosting services, the mobile network operator(s) for InControl Services, our provider(s) of anonymised analytics services, and our marketing services provider(s).
- In order to process your InControl Services and other subscription renewals it is also necessary to disclose information that relates to your InControl Services subscription with our eCommerce services provider. This includes vehicle identification information and personal information, such as your name, address, telephone number and e-mail address. We use third parties to support our administrative functions in order to allow us to process and switch on subscription service orders. We will limit the data that is shared to that which is necessary for providing the service.
- Our network of retailers, authorised repairers and where relevant our importers network (together our “Retail Network”), so as to be able to fulfil requests for goods, services, etc., and for assessment and training, to be able to enhance the quality of the services you obtain when interacting with our Retail Network.
- Jaguar Land Rover group companies in line with the data uses set out in this Privacy Policy.
- Third parties in the event we sell or buy any business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or requests, or to the extent disclosure is permitted by legislation or a legal exemption, (including but not limited to, disclosure for the purpose of legal proceedings, obtaining legal advice or establishing, exercising or defending legal rights, the prevention or detection of crime, the apprehension or prosecution of offenders, or the safeguarding national security); or in order to enforce our contract terms, to investigate actual or suspected breaches, or to protect the rights, property or safety of Jaguar Land Rover or its customers.
- If your vehicle is owned, leased or managed by a business or other organisation, we will disclose Vehicle Identification Information to the third party to allow them to manage, renew and cancel the InControl Package subscriptions of vehicles in their fleet.

We have safeguards in place with our service providers to ensure that your data is kept securely and used in accordance with the purposes set out in this Privacy Policy. **TELL ME MORE ...**

**... about JLRs network of Independent Third Parties ...**

We work with a number of independent third parties to provide services, such as our Retail Network, credit product providers and contract hire products. Personal data may be sent directly to these entities by you (for

example if you contact them by phone or email or via their website pages), or we may share personal data with them where appropriate to support with your queries or other service requirements.

Where you use the Jaguar Land Rover websites to find or make contact with our Retail Network, a credit provider, or a contract hire product provider, these are (unless otherwise stated), independent businesses and not Jaguar Land Rover group companies. Any contact you make to them (for example, to call or send an email) and any data you provide to them in use of their websites, will be controlled by them, not by JLR. If you have questions regarding a third party's (such as a retailer, importer, credit provider, contract hire product provider or repairer's) use of your personal data, we recommend you contact those parties directly.

For information on independent third parties we work with:

For Jaguar:

- Our Retail Network is generally identifiable from the 'locate a retailer' website functionality. They can be searched for by name, location or postcode. A full list of all authorised retailers is accessible here: <https://www.jaguar.com/retailer-locator/index.html>.
- In Ireland, credit is provided by the Bank of Ireland Finance.

For Land Rover:

- Our Retail Network is generally identifiable from the 'locate a retailer' website functionality. They can be searched for by name, location or postcode. A full list of all authorised retailers is accessible here: <https://www.landrover.com/dealer-locator.html>.
- Credit products are provided by Bank of Ireland Finance.

### **... about Suppliers ...**

We use a number of service suppliers to support our business and these service providers may have access to our systems and data in order to provide services to us and on your behalf, for example payment processors, information technology such as hosting or cloud service providers, marketing, analytics and digital advertising support services, connected car technology providers, including vehicle content support, authentication services, customer services and relationship handling, service and system specialists, administrative or support services, and website analytics support.

### **... about JAGUAR LAND ROVER Group companies, and how they may provide service support ...**

As a member of the Tata Group of companies, we can benefit from the large IT infrastructure and expertise that exists within our wider corporate structure. This means that the personal data you provide to us may be accessed by members of our group of companies only as necessary for service and system maintenance and support, aggregate analytics, business continuity, IT and administrative purposes. For example, where necessary to support particular website enquiries, or to provide technical support that maintains website functionality.

**... about Public bodies, law enforcement and regulators ...**

From time to time, the police, other law enforcement agencies and regulators can request personal data, for example for the purposes of preventing or detecting crime, or apprehending or prosecuting offenders.

**6. INFORMATION ABOUT INTERNATIONAL DATA TRANSFERS.**

The data that we collect from you will be stored in the European Economic Area (“EEA”) and/or other countries to the extent required for us or our service providers to provide the vehicle and InControl Services. It may be processed by personnel operating outside the EEA who work for us or for one of our service providers, including those engaged in the provision of the InControl Services. Where personal data is shared outside of the EEA, we apply safeguards to add to the data protections that apply to those data transfers. This includes an assessment of the adequacy of the third country in question, use of European Commission approved model contract terms where appropriate, and assessment of Privacy Shield certification for US located entities where applicable.

**TELL ME MORE ...**

**... about the adequacy checks JAGUAR LAND ROVER puts in place for international data transfers ...**

Where JAGUAR LAND ROVER chooses to share personal data with a third party located outside the EU, the following factors are assessed to support adequate transfer of this data:

- **Internal checks to identify the existence or absence of any adequacy decision by the European Commission.** We have group companies, and use suppliers located in countries that have been approved by the European Commission as having essentially equivalent data protection laws. A full list of these countries as at the date of this Privacy Policy is: Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Switzerland, Japan, Jersey, New Zealand, Uruguay and the Isle of Man. (The European Commission has also approved as adequate the EU-US Privacy Shield programme – this is described below). This list and information about the protections the European Commission has considered is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).
- **Use of measures like European Commission approved measures to support adequate transfers of personal data.** We also have group companies, and use suppliers located in countries that are elsewhere in the world. To manage data protection compliance with these transfers, we will use European Commission approved data transfer mechanisms such as use of model contractual clauses approved by the Commission. We will also assess, where applicable, where a supplier is able to demonstrate to us they have Binding Corporate Rules. (Binding Corporate Rules is a GDPR – recognised Data Protection mechanism to ensure adequate personal data transfers). We may work with suppliers who are able to demonstrate to us they are Privacy Shield certified.

- To understand the protections required in European Commission approved Model Clauses, a template copy of these is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).
- To see a full list of approved Binding Corporate Rules, please use the following link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_en).
- A full list of Privacy Shield participants, and their Privacy Shield certification information is available here: <https://www.privacyshield.gov/welcome>.

## **7. HOW LONG WE HOLD PERSONAL DATA FOR.**

We'll keep your personal data for as long as we need it to provide the products and services you've signed up to. We may also keep it to comply with our legal obligations, meet service or contract commitments, respond to queries and resolve any disputes, to meet our legitimate interests and to enforce our rights.

The criteria we use to determine storage periods include the following: contractual provisions that are in force, legal statutory limitation periods, applicable regulatory requirements and industry standards.

## **8. KEEPING YOUR INFORMATION SECURE**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We require all of our service providers to have appropriate measures in place to maintain the security of your information and such service providers will only be able to access and use your information for the purpose of providing the agreed services.

Where we have given you (or where you have chosen) a password that enables you to access your InControl Services account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, due to the nature of the internet and telecommunications, the transmission of information via these channels is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet; any transmission is at your own risk. Your information will be kept in a secure environment protected by a combination of physical and technical measures such as encryption technologies or authentication systems to prevent any loss, misuse, alteration, disclosure, destruction, theft or unauthorised access. Where you have a vehicle with a web browser, you are advised to take care in its use and to only access websites you trust.

## **9. YOUR DATA PROTECTION RIGHTS.**

You have rights in connection with your personal data, including: to withdraw consent where you have given it, to be informed and have access to your personal data, to correct or complete inaccurate data, and in certain circumstances to restrict, request erasure, object to processing, or request portability of your personal data to another organisation.

You may at any time update your personal data held by us via the My InControl website or Remote App.

We try to ensure that we deliver the best levels of customer service. If you do need or want to get in touch with us for any reason regarding your data protection rights, please get in touch using the email address below, and add into the subject header that it relates to your data protection rights. This Customer Relationship email address is the appropriate contact details for our Data Protection Officer where queries are data protection related:

- [jlir-euro-importer-customer-relations@jaguarlandrover.com](mailto:jlir-euro-importer-customer-relations@jaguarlandrover.com)

If you are not happy and have a data protection related complaint, please contact us direct at this email address: [DPOffice@jaguarlandrover.com](mailto:DPOffice@jaguarlandrover.com). If you are not satisfied, you also have the right to complain to a supervisory authority.

To learn more about these data protection rights, see the “Tell me more” box below.

#### **TELL ME MORE ...**

##### **... about my data subject rights ...**

If you have given us consent to process your personal data, including for electronic marketing communications, you have the right to withdraw that consent at any time. Just use the unsubscribe options presented, for example, these are present in the email marketing communications sent by us.

- You can ask for access to the personal data we hold about you, object to the processing, request that we correct any mistakes, restrict or stop processing or delete it. If you do ask us to delete or stop processing it, we will not always be required to do so. If this is the case, we will explain why.
- In certain circumstances you can ask us to provide you with your personal data in a usable electronic format and transmit it to a third party (right to data portability). This right only applies in certain circumstances. Where it does not apply, we will explain why.

#### **10. CHANGES TO THIS POLICY**

Updates to this Privacy Policy will be displayed here: <https://incontrol.jaguar.com/jaguar-portal-owner-web/about/privacy-policy/IRL> and <https://incontrol.landrover.com/jlr-portal-owner-web/about/privacy-policy/IRL>. A notice will be posted on the My InControl website along with the updated privacy policy.

#### **11. LINKS TO OTHER WEBSITES**

The My InControl website may contain links to other websites run by other organisations which we do not control. This Privacy Policy does not apply to those other websites, so we encourage you to read their privacy statements. Please note that this policy also does not apply to third party services and websites more generally, including those which you may access in connection with your use of the InControl package, or when you sign up to an app or services directly with a third party. Please refer in these instances to the relevant third party's privacy policy. We are not responsible for the privacy policies and practices of other websites and apps (even if you access them using links that we provide). We provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness.

## INCONTROL COOKIES POLICY

### My InControl website

The My InControl website and the InControl webpages use cookies to distinguish you from other users of the My InControl website. This helps us to provide you with a good experience when you use the InControl Services and also allows us to improve the InControl Services.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies can help a website to arrange content to match your preferred interests more quickly - most major websites use cookies. Cookies alone cannot be used to identify you. A cookie will typically contain the name of the domain from which the cookie has come; the "lifetime" of the cookie; and a value, usually a randomly generated unique number.

Two types of cookies are used on the My InControl website.

- **Session Cookies**, which are temporary cookies that remain in the cookie file of your browser until you leave the site; and
- **Persistent Cookies**, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Session Cookies are used:

- To allow you to carry information across pages of our site and avoid having to re-enter information; and
- Within registration to allow you to access stored information.

Persistent Cookies are used:

- To help us recognise you as a unique visitor (using a number, you cannot be identified personally) when you return to our website;

- To allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly; and
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally in this way.

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the service if cookies are disabled.

Below is a list of the main cookies we use, and what we use them for.

Cookie name	Cookie type	Cookie purpose
JSESSIONID	Session	Within a session of your use of the website, this cookie temporarily stores information you have entered to allow some features of the website to work as you move between pages.
cookieInfoShown	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.
jlr-remember-me	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores a token for your identification.
jlr-remember-me-login-name	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores your username for identification.
jlr-selected-locale	Persistent	This cookie stores what language you prefer to view the portal in.
Google Analytics	Persistent	We use Google Analytics to compile anonymous, aggregated statistics that allow us to understand how users use our website and to help us improve the structure of our website. This data does not identify you personally. Please see <a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a> and <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> for further information.

You may delete and block all cookies from the My InControl website by activating the setting on your browser that allows you to refuse the setting of all or some cookies. If you use your browser settings to block cookies you may find that some elements of our website may not work correctly.

### InControl Remote App

We use analytics tools, including Google Analytics, on the InControl Remote App. These are used to compile anonymous, aggregated statistics that allow us to understand how our customers use the InControl Remote App and to help us improve it. This data does not identify you personally. Please see [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners) for further information.

You may choose to disable Google Analytics on the InControl Remote App via your account settings.