

InControl Privacy Policy
Effective date: 30 November 2023

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 the data controller: Jaguar Land Rover Limited, whose registered office is at: Abbey Road, Whitley, Coventry CV3 4LF, England, and whose registered number is: 1672070, with authorised use of personal data by its South African subsidiary, Jaguar Land Rover (South Africa) (Pty) Ltd (Registration number: 2001/027269/07).

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 find our contact details at the following web page: <https://www.jaguar.co.za/contact-us/index.html> and <https://www.landrover.co.za/ownership/contact-us/index.html>.

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 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 "InControl Remote App" is the smartphone application ("App") that you have downloaded from the Online Store onto your smartphone or handheld device (collectively referred to as

“**Device**”) which enables you to use the ‘Remote Essentials’ features and, depending on your subscription, the ‘Remote / Remote Premium’ features;

- the “**Remote Park Assist App**” which is the smartphone application which you have downloaded from the Online Store and which enables you to use the “Remote Park Assist” 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, the Remote Park Assist App and the My InControl website; (ii) the “SOS Emergency Call” services; (iii) the “Optimised Roadside Assistance” 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 Touch Pro 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,

in vehicles purchased in South Africa, Botswana and Namibia.

Please be aware that the following websites have their own separate website terms and Privacy Policy and are currently not within the scope of this Privacy Policy. The Jaguar Land Rover Website privacy policy can be found here:

<https://www.jaguar.co.za/privacy-policy/index.html>

<https://www.landrover.co.za/privacy-policy/index.html>

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 and its Features, 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 smartphone 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, or the Remote Park Assist App onto your smartphone Device, including the operating system, make, model and version, the InControl Remote App and/or the Remote Park Assist 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 include 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 App services that are available to you. Our Apps may offer you the choice to enable the use of your Device's fingerprint or retina scan technology to validate your identity within the App, in such cases we will not collect your fingerprint or retina scan information, we will only receive confirmation from your Device that the validation check was successful. 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" function is activated, real-time location data relating to the vehicle will be activated automatically upon occurrence of a relevant trigger event, such as the deployment of your vehicle's airbags, 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 certain InControl Services and Feature 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 as described in your vehicle handbook which can be found here: <https://www.ownerinfo.jaguar.com> and <https://www.ownerinfo.landrover.com>.

- **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” or the “Optimised Roadside Assistance” 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.
- **Speech Data Log Information:** The voice data and Submitted Data that is shared with our voice services providers to allow your voice commands to be responded to, may include the following: audio files, associated transcriptions and log files.
- **Vehicle Operation Information:** this includes technical data related to the vehicle as a product including data regarding vehicle components (e.g. serial number, software version); vehicle quality and maintenance (e.g. diagnostic trouble codes); information about the vehicle being involved in an accident such as the fact that the airbags have been deployed or the sensors have been activated; and 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 and its Features and the InControl Services. 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 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.
- **Feature information:** feature specific information such as favourites, notes, media, and information you choose to submit to the 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, 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 Driver and Vehicle Licensing Agency (DVLA) 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.
- **Remote Park Assist App data:** The Remote Park Assist App relies on a Wi-Fi connection between your Device and the vehicle. When controlling your vehicle, the signals will be processed on the vehicle hardware only and are not sent to our offboard servers. We will ask for your InControl Account sign-in credentials and PIN when you log into the Remote Park Assist App. This allows us to check that you have a valid InControl Account and, once your vehicle is successfully paired to your Device, display certain information about your vehicle in the Remote Park Assist App.

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 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:

Activities that may require the collection or handling of personal information:	The types of information we handled:	Applicable Legal Grounds:
<ul style="list-style-type: none"> ○ Industry mandated/legislative requirements such as: <ul style="list-style-type: none"> ▪ Emergency services (eCall) where legally mandated. ▪ Maintaining features and services cyber security and safety (including through the release of software over the air updates). ▪ Communicating or sharing vehicle originated data with applicable authorities as legally mandated. ○ Communication of urgent safety or product recall notice ○ Management of legal and regulatory requirements or legal claims, including for purposes such as: <ul style="list-style-type: none"> ▪ To comply with our legal obligations or defend our legal rights. ▪ For the prevention/detection of crime, (including where required to assist HMRC/tax authorities, law enforcement agencies such as the Police, the DVLA or any other public authority or criminal investigation body, or for the safeguarding of national security). 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Location Information ▪ Journey Information ▪ Vehicle Operation Information ▪ Log Information, ▪ Public Sources data ▪ Third Party data ▪ Device Information 	<p>Legal Obligation</p>
<ul style="list-style-type: none"> ○ Set up and operation of vehicle features and services (including through third party feature providers): <p>Note in particular that:</p> <ul style="list-style-type: none"> ▪ Location Information will be processed as necessary for the provision of location-based features and services you have signed up to or requested. ▪ Speech Data Log Information will be handled and shared with relevant service providers strictly for the purposes of operating speech activated features and services. <ul style="list-style-type: none"> ○ Maintenance of features and services (including through the release of software over the air updates): <ul style="list-style-type: none"> ▪ Identification of failure modes, bug fixes and diagnostic and prognostic issues. ▪ Resolution of issues, queries and complaints (including the management of warranty related issues). ○ Network and information security: <ul style="list-style-type: none"> ▪ To maintain our network and platform information security and more generally to protect your information against loss or damage, theft or unauthorised access. ▪ 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 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Location Information ▪ Journey Information ▪ Speech Data Log Information ▪ Vehicle Operation Information ▪ Log Information, ▪ Feature Information ▪ Public Sources data ▪ Third Party data ▪ Security and Authentication information ▪ 'Remember me' and 'Remember Pin' functions 	<p>Contract</p>

<p>our providers of security authentication and hosting services in order to verify identity and prevent unauthorised use of our services including InControl Services.</p> <ul style="list-style-type: none"> ○ Service contract and subscription related communications ○ Records maintenance and general contract/services administration 		
<ul style="list-style-type: none"> ○ Responding to customer enquiries and resolving issues (pre or post-contract) <ul style="list-style-type: none"> ▪ For internal operations and administrative purposes (for example, this will include troubleshooting, testing, supporting our audit requirements, investigating potential misuse and in responding to any enquiries you may make) and to support your queries. ▪ We may record calls with you for training and quality purposes and to help resolve disputes. ○ Customer product/feature related communication (where those are not of a marketing or promotional nature, e.g. providing updates regarding contracted services or features) ○ Vehicle Health Notification (VHN): <ul style="list-style-type: none"> ▪ To communicate with you regarding the status of specific health warnings in your vehicle. ○ Marketing and promotional communications (where those do not otherwise require consent) such as: <ul style="list-style-type: none"> ▪ Post, phone, marketing or promotional communications; ▪ Digital or social media marketing where this is not individually targeted; ▪ Service contract and subscription renewal offers regarding your existing services; ▪ Marketing and promotional communications related to similar products and services, <p>except where you have opted-out from receiving such communications.</p> ○ Research and Development, Data Aggregation and Data Analytics: <p>For the purposes of:</p> <ul style="list-style-type: none"> ▪ product development and improvement; ▪ identification of failure modes, required bug fixes, diagnostic and prognostic issues; and ▪ evaluation of feature usage, trends and preferences. <p>This includes the process of anonymising data for the purposes of further research/analytics/statistical purposes (including without limitation for network and information security purposes).</p> 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Marketing data, ▪ Location information and Journey Information (except where consent is required by law) ▪ Vehicle operation data ▪ Device information ▪ Third Party data ▪ Log information ▪ Call Log Information ▪ App Log Information ▪ Security and Authentication data ▪ Public Sources data 	<p>Legitimate Business Interest</p>

<ul style="list-style-type: none"> ○ Enhancing your website, infotainment and overall customer experience: <ul style="list-style-type: none"> ▪ To enhance and simplify your experience across Jaguar Land Rover websites, in-vehicle experiences, in-app features (for example, to detect screen size to fit the Device you are accessing the service on) 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). ▪ Pre-filling website data fields to enhance and streamline your online experience. ○ Verify changes to your vehicle ownership and support to unbind your InControl Account ○ Records maintenance and general administration: <ul style="list-style-type: none"> ▪ 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>We may record calls with you for training and quality purposes and to help resolve disputes.</p> <ul style="list-style-type: none"> ○ Corporate acquisitions and disposals 		
<ul style="list-style-type: none"> ○ Data aggregation, analytics and profiling: <p>As indicated above, we will 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. Where we use the output of those activities for profiling and tailored marketing purposes, as further described below, we will seek your consent.</p> ○ Marketing and promotional communications: <ul style="list-style-type: none"> ▪ We may send marketing communications to you including by electronic means (e.g. email, text, digital or social media, etc.), related to products or services that may be of interest to you. ▪ We may also share your details with our network of independent third parties, for sending marketing communications, including by electronic means. ▪ We may use cookies for tailored marketing purposes (please see our Cookies Policy). ○ Use of Location Information for Research and Development, Data Aggregation and Data (where 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Vehicle operation data ▪ Location Information ▪ Journey Information ▪ Vehicle Operation Information ▪ Third Party data ▪ Marketing data 	<p>Consent</p>

<p>consent is required by law for the use of non-aggregated/specific geolocation data)</p> <ul style="list-style-type: none"> ○ Software over the Air Updates: <ul style="list-style-type: none"> ▪ To deploy over the air updates to your vehicle where those updates are not related to a service you have subscribed to or otherwise require prior user consent for their deployment. <p>Note: Where we collect your personal data with consent for any of the above purposes, you may withdraw your consent for us to use your information at any time. Please see Withdrawing your consent in Section 9 below for further details. Your right to withdraw consent does not affect the lawfulness of processing that was based on that consent before its withdrawal.</p>		
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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 and subscription related services (including but not limited to voice assistant Features and services, finance, insurance, warranty, lease/hire), and InControl service providers, so we can provide to you, and monitor the usage and performance of, the products and services you are eligible for, have signed up to or requested, or that are appropriate for your vehicle, for example, InControl Services, Features, available vehicle services, and Software Updates.
- In order to enable third party services and Features, you may be required to connect your InControl account to your applicable third party account. If you choose to connect your accounts, we may share certain Submitted Information, Vehicle Identification Information, Location Information, Journey Information, Vehicle Operation Information, Log Information and/or Feature information required by the third party service provider in order for them to provide the service or Feature you have chosen to enable. Please refer to the relevant third party's privacy policy for information on how their services process personal data.
- 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, and communicate to you about, 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>.

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>.

... 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 United Kingdom (UK) and 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 UK and 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 UK and/or 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 (or where applicable, UK approved) model contract terms where appropriate, and assessment of Privacy Shield certification for US located entities (where this is deemed as an adequate method of transfer).

TELL ME MORE ...

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

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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 applicable 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 EU-US Privacy Shield programme 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.

- **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 or UK approved data transfer mechanisms such as use of approved model contractual clauses. 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 where this is deemed as an adequate method of transfer.
 - 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.
 - 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.
 - 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 else. We do not store login credentials to third party services you have chosen to connect to, we will securely store an authorisation token only.

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 Customer Relationship email address below and add into the subject header that it relates to your data protection rights.

- crcza@jaguarlandrover.com

If you are not happy and have a data protection related complaint, please contact our Data Protection Officer directly at this email address: 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.

...about how I can get in touch with the UK supervisory authority...

The Information Commissioner’s Office (the ICO) is the supervisory authority that regulates personal data in the UK. You can get in touch with the ICO in any of the following ways:

- By going to their website: www.ico.org.uk
- By giving them a call on 0303 123 1113
- or by writing to them at the following address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

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/ZAF> and <https://incontrol.landrover.com/jlr-portal-owner-web/about/privacy-policy/ZAF>. A notice will be posted on the My InControl website along with the updated privacy policy.

11. THIRD PARTY SERVICES AND 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.

COOKIES POLICY

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.

We use two types of cookies as described in the tables below.

- **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.

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.

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 on the My InControl website, and what we use them for.

Cookie name	Cookie type	Cookie purpose	Duration
cookieInfoShownDealer	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.	2 Calendar months from first interaction with the site.
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.	30 minutes from use of the site.
cookieInfoShown	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.	1 calendar year from first interaction with the site.
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.	During your usage of the site from your first interaction with the site.
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.	During your usage of the site from your first interaction with the site.
jlr-selected-locale	Persistent	This cookie stores what language you prefer to view the portal in.	During your usage of the site from your first interaction with the site.
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 www.google.com/policies/privacy/partners and	2 Calendar years from your interaction with the site.

	https://tools.google.com/dlpage/gaoptout for further information.	
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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.

The Pivi Infotainment System

The Pivi Infotainment system uses analytics tools (including first party cookies) to understand your usage of and help us to improve and identify issues with the Pivi Pro Features. You have the ability to accept or decline cookies by modifying the settings in the Pivi Infotainment system you may change your choice at any time in the vehicle settings.

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

Cookie Name	Cookie Type	Purpose	Duration
fs_uid	Persistent	This cookie is stored off-board and is used to track user identification	Expires 1 year after first use of an enabled app.
fs_session	Session	This cookie stores session information for analytics	Expires 30 days after first use of an enabled app.
fs_csrf_token	Persistent	This cookie stores a token for identification	Expires 30 days after first use of an enabled app.
fs_trusted_device	Persistent	This cookie contains device information about the Pivi system to establish a secure connection	Expires 60 days after first use of an enabled app.
fs_last_activity	Persistent	This cookie stores information about the current session to assist with session timeouts.	Expires when the Feature closes.

App Analytics

We use analytics tools to compile anonymous, aggregated statistics that allow us to understand how our customers use our Apps and to help us improve them. This includes the logging of App crashes and failures for quality assurance purposes and App usage. This data does not identify you personally. You may choose to disable App Analytics on the Apps via your account settings.