

Privacy Notice Roadside Assistance / MOBIL

The data controllers are:

Auto Sales Limited (hereinafter "Provider") or the respective country sales company in which the breakdown occurs (for an overview and contact data for all Mercedes-Benz country sales companies please refer to the general websites of Mercedes-Benz) and

Mercedes-Benz AG, Mercedesstraße 120, 70372 Stuttgart, Germany, email: dialog.mb@mercedes-benz.com (hereinafter "MBAG")

The contact person for your data protection questions as data protection officer is:

Mercedes-Benz Group AG
Chief Officer Corporate Data Protection
HPC E600
70546 Stuttgart
Germany
Email: data.protection@mercedes-benz.com

Mercedes-Benz AG and the Provider or the respective country sales company in which the breakdown occurs jointly process personal data as controllers in the above sense. For this purpose, they have defined the responsibility for compliance with data protection requirements in a data protection agreement. Upon request, the Provider shall provide the data subjects with a summary of the main provisions of this agreement to the extent required by law. Inquiries regarding the processing of personal data and data subject rights should first be made to the contact points identified in this Privacy Notice (country-specific service center on behalf of the provider; see 6.). This does not affect the right to also address corresponding inquiries to Mercedes-Benz AG or the respective country sales company including the sales company in the country in which the breakdown occurs.

If you are located in a market outside of the European Economic Area (EEA) local laws and regulations with regard to the protection of personal data may apply to you and the Mercedes Benz companies involved in the processing activities. This notification shall also serve and is intended to satisfy any local law transparency requirements while any references to the EU General Data Protection Regulation (GDPR) shall also be interpreted as reference to respective local law provisions, if any. The Provider or the respective country sales company in which the breakdown occurs may also provide further information on the processing of personal data in the context of Roadside Assistance within the data protection notifications on their website which is each indicated on the following pages of this service booklet and to which reference shall be made.

1. Data categories and their deletion rules

The following categories of data are collected and processed in connection with the Roadside Assistance product and Service24h.

1.1 Customer and contact information

Data types, including :

- Contact information (first and last name, address, phone number, e-mail address)
- Language (for the purpose of support)

1.2 Vehicle and case data

Data types, including :

- VIN, mileage, first registration
- Maintenance status information
- Vehicle condition in case of breakdown
- Position data

1.3 Invoice data

Data types:

- Combination of individual data points from the data category 1.2 (including vehicle condition, VIN, mileage, breakdown location).

Deletion rules for the data categories from 1.1 - 1.3

- Storage for the purpose of contract performance, for as long as necessary to perform the agreed services during the term of the contract.
- Storage for the purpose of fulfilling legal obligations for retention, which may range between 5 and up to 10 years or longer depending on the legal requirements of the market where the service has been performed
- Storage for the purpose of fulfilling legitimate interests (including processing warranty claims, product liability and product defense, ranging between 10 or up to 30 years depending on the legal framework in the relevant market).
- As soon as the purpose for storing the data no longer applies, the respective personal data is deleted. For more information on the retention periods applicable in your market, please refer to the data protection information available on the websites of the respective country sales companies.
- Insofar as processing is based on legitimate interests, the country-specific service centers (service hotlines and emergency call centers) will provide information on behalf of the Provider about the retention period applicable to your market. You will find the respective contact details in this service

booklet. Some Providers will provide further details on the websites of the respective country sales companies as part of their data protection information. For website address and contact details please see the following pages of this service booklet.

2. Legal basis and purposes of the processing of personal data

Personal data is processed within the framework of the Roadside Assistance product and the Service24h as follows:

2.1 For the fulfillment of the contract (legal basis Article 6 (1) lit. b) GDPR) by the Provider and service partners in the country in which the breakdown occurs, in particular for the purpose of organizing Roadside Assistance (checking eligibility and carrying out the breakdown assistance including associated processes).

2.2 For the fulfillment of legitimate interests (legal basis Article 6 (1) lit. f) GDPR), by the Provider together with Mercedes-Benz AG, among other things, for the purpose of and legitimate interests in the provision of cross-border roadside assistance services and coordination and processing with the service providers commissioned for Europe (centralized service provision with uniform service standards, efficiency and cost optimization), central administration and billing of services within the group of companies and vis-à-vis the service providers (internal administrative purposes) as well as market control, business and profitability analyses as well as the needs-based design of services and improvement of the customer experience by means of pseudonymized business analytics and reporting. The controllers take into account in particular the type of personal data, the purpose of processing, the circumstances of processing and your interest in the confidentiality of your personal data as part of the necessary balancing of interests in each case.

2.3 To fulfill a legal obligation (legal basis Article 6 (1) lit. c) GDPR), in the context of the invoicing and associated statutory retention periods.

The above information is necessary to perform Roadside Assistance services and related statutory obligations. If the data is not provided services might not or not be performed in full.

3. Recipient of the data

The controllers will forward customer, contact, case and vehicle data to the following third parties to the extent necessary in each case, or the following third parties will have access to corresponding data in connection with Roadside Assistance:

- Mercedes-Benz/smart contract partner (service partner for support in the event of a breakdown)

- Mercedes-Benz Versicherung AG (internal assumption of costs as insurer within the group of companies)

In order to provide the services, additional service providers are used who process personal data to the extent required in each case and generally act as data processors (currently, among others, Mercedes-Benz Customer Assistance Center, Maastricht as processors for the Provider / markets and Mercedes-Benz AG as service provider within the scope of data processing, service provider for internal controlling, service provider for the processing of Roadside Assistance Services, currently AXA Assistance Deutschland GmbH and RAC Motoring (for UK), both commissioned via Mercedes-Benz AG).

4. Data transfer to third countries

Within the scope of Roadside Assistance, personal data may be transferred to recipients in countries outside the European Union ("EU") and the EEA (= European Economic Area), for which no adequacy decision of the EU Commission pursuant to Article 45 GDPR exists. The transfer is usually made on the basis of Art. 49 (1) lit. b) GDPR for the performance of the contract (depending on the location of the vehicle, possibly also in a country outside the EEA). Otherwise, in individual cases, a transfer to service providers in third countries may take place. The transfer to countries outside the EEA, for which there is no adequacy decision of the EU Commission pursuant to Art. 45 GDPR, takes place on the basis of so-called Binding Corporate Rules (cf. Art. 47 GDPR) or the EU Standard Contractual Clauses of the EU Commission, which can be accessed at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en. Further information on this is available on request from the contact point named below (cf. 6.).

5. Information security

We use technical and organizational security measures to protect the data we have under our control against manipulation, loss, destruction and against access by unauthorized persons. We continuously improve our security measures in line with technological developments.

6. Your data subject rights

As a data subject of the data processing, you have the right of access (Art. 15 GDPR), rectification (Art. 16 GDPR), deletion (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and data portability (Art. 20 GDPR). We kindly ask you to send corresponding data subject requests either to Mercedes-Benz Customer Assistance Center N.V. ("We"), Gelissendomein 5, 6229GK Maastricht, Netherlands via data.protection@mercedes-bez.com or to the country-specific service center operated on behalf of the Provider. **The contact details of the Mercedes-Benz Customer Assistance Center and/or the country-specific service centers can be found in this service booklet.**

This does not affect your right to assert your data subject rights against Mercedes-Benz AG and the other companies involved.

If you have consented to the processing of your personal data by us, you have the right to revoke your consent at any time. The lawfulness of the processing of your personal data until a revocation is not affected by the revocation. Likewise, further processing of this data on the basis of another legal basis, such as for the fulfillment of legal obligations, remains unaffected. If you believe that the processing of your personal data violates legal requirements, you have the right to lodge a complaint with a competent data protection supervisory authority (Art. 77 GDPR).

Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Art. 6 (1) lit. e) GDPR (data processing in the public interest) or Art. 6 (1) lit. f) GDPR (data processing on the basis of a balancing of interests). If you object, we will only further process your personal data insofar as we can demonstrate compelling legitimate grounds for doing so that override your interests, rights and freedoms, or insofar as the processing serves to assert, exercise or defend legal claims. If we process your personal data for the purpose of direct marketing to protect legitimate interests on the basis of a balance of interests, you also have the right to object to this at any time without stating reasons.

This privacy notice may change from time to time and/or vary by country. If applicable, the notices available on the websites of the respective country sales companies contain further information on data protection. Please also refer to the privacy notices available on the websites of the respective country sales companies for any changes and country-specific notices. For website address and contact details please see the following pages of this service booklet.