



PRIVACY NOTICE

KINTO Flex users – Belgium
Effective date: 22/02/2022.

This Privacy Notice (the “Privacy Notice”) explains how your personal data is collected and processed by KINTO BE, (“KINTO”, “we” or “us”) when you create an account, get verified and use our subscription service KINTO Flex. There are several solutions for flexible mobility services within KINTO and such services together form the brand KINTO. This Privacy Notice describes how we collect and process your personal data within KINTO Flex. If you share your personal data for the purpose of using other KINTO/Toyota/Lexus services, we kindly ask you to read the privacy notice for that respective service.

1. Who is responsible for the collection and use of your personal data?

KINTO is responsible for collecting and processing your personal data (data controller). Our contact details are:

Postal address: Leuvensesteenweg 369, 1932 Zaventem

Visiting address: Leuvensesteenweg 369, 1932 Zaventem

Telephone number: +32 (0) 2 895 06 55

Websites: www.kinto-mobility.be

DPO contact details: danny.meulenberghs@toyota-fs.com

KINTO process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation) (“GDPR”).

2. How do we process your personal data?

We process your personal data in connection with the creation of your KINTO Flex account, in the verification process, when you request and use a vehicle, upon returning or changing the vehicle and when terminating your KINTO Flex account. We collect your personal data directly from you as well as from external sources which are listed below.

The personal data that we process is described in detail below in “Processing of your personal data” as well as in our Privacy Policy that is accessible via our website www.kinto-mobility.be

3. What is KINTO Flex?

KINTO Flex is a subscription service. It comprises:

- car subscription service for the use of a Toyota or Lexus vehicle.
- the web portal (the “**Web Portal**”) that will be used to make and manage reservations and to grant access to the requested vehicle; and
- support centre via telephone, the Web Portal.

Processing of your personal data

This section explains **how**, **why** and by **whom** your personal data is processed when you register with and use KINTO Flex.

Step 1 – Creation and verification of your KINTO Flex account

a) Creation

To register and use KINTO Flex, you need a membership. In order to apply for such membership, you will have to register in the Web Portal.

Summarising table – When creating your account:	
➡ <i>What personal information do we collect about you? (“Registration Data”)</i>	Your full legal name Your email address Date of birth Your phone number Your home address Your gender Your selfie Your Driving license information
➡ <i>How do we collect your personal information?</i>	You provide us with your data and/or it’s pulled from your driving licence
➡ <i>What do we use your personal information for?</i>	To approve your application and in order to conduct preparatory measures to provide you access to your KINTO Flex account Sharing marketing communication that you might be interested in
➡ <i>How long do we keep it for?</i>	The data will be retained until the subscription agreement is terminated, for an additional 90 days in order to establish, exercise or defend any legal claims.

When you register you must provide your email address, create a unique password, phone number, home address, upload your selfie & driving licence, from which we pull all remaining information: full name, date of birth, gender, driving licence details. This information constitutes your **"Registration Data"**. Once your Registration Data is submitted, you will have to confirm your phone number by receiving a text message. You will also be required to confirm your acceptance of the KINTO Flex terms of use (the **"Terms of Use"**). Should you want to receive marketing communications about our services, the possibility of consenting will be offered to you.

b) Verification

1. Verification of your KINTO Flex account

Categories of personal data: Once your account is created, it needs to be verified in order for you to use the KINTO Flex service. To do this, we use your personal data provided during Registration & stored in (**"Account Information"**): your selfie & your driving licence photo.

Validity of your driving license: We will use your driving licence information to verify its validity compared to the Belgian law register of driving licences. The check of the validity is done automatically by one of our partners. In case the automatic verification cannot be done (eg. because the quality of the picture of the driving licence or any other technical issues) we will instead manually verify your driving licence information with the photos of you and the driving licence that you have provided us with.

During your subscription agreement, we will also check from time to time that you have a valid driving licence by searching in the Belgium Transport Agency's register of drivers' licences.

Legal basis for processing: The processing of your Account Information as described above is made in order to conclude the car subscription agreement you entered with us and in compliance with current legislation.

Retention period: your Account Information will be retained until the car subscription agreement is terminated and for an additional 90 days in order to establish, exercise or defend any legal claims. We might keep your Account Information longer to comply with legal obligations such as replying to requests from authorities including the Belgian Transport Agency's or the Belgian Police.

Data retention: If we get a match with the information list, such data will be retained until the car subscription contract is terminated and for an additional 90 days in order to determine, make or defend any legal claims. The reporting information basis to the information list is only retained during the time necessary for the data to have been received and registered by data protection authority, which generally is within three

business days. More information on how personal data is processed on the website data protection. The information list is available at: www.dataprotectionauthority.be

2. *Payment ability assessment when using making a reservation*

Legal basis for processing: The processing is based on our legitimate interest to get payment obligations fulfilled.

Data retention: your data will be retained until the car subscription agreement is terminated and for an additional 90 days in order to establish, exercise or defend any legal claims. We might keep your data longer to comply with legal obligations such as replying to requests from authorities including the Belgian Transport Agency's or the Belgian Police.

3. *Rejection of activation of KINTO Flex account*

Rejection of activation: Your account might not get activated, for example due to your driving licence identity not having been matched with your selfie, or due to your ability to pay (credit card) not being assessed as acceptable. According to GDPR you have, as a main rule, the right not to be subject to a decision that is based solely on automated processing (including profiling) and that produces legal (or similarly significant) effects to you. However, this is not the case if such decision-making is necessary when entering into or performing a contract between you and us.

Summarising table - When verifying your account	
➡ <i>What personal information do we collect about you? ("Account Information")</i>	A photo of you (selfie) Your driving licence number Expiry date of your driving licence Your date of birth Your home address Your payment card number Cardholder name on your credit/debit card Expiry Date of your credit/debit card CVC of your credit/debit card Registered address
➡ <i>How do we collect your personal information?</i>	You provide us with your data Financial services providers/ Insurance intermediaries
➡ <i>What do we use your personal information for?</i>	To identify whether you are the holder of the driving licence To perform a driving licence check that will verify your document is legitimate and valid and that you are the owner of that document.

	<p>To make sure your chosen payment method is acceptable, and your funds are sufficient to cover the costs of your requested services</p> <p>To meet all the pre-requisites that are necessary for you to benefit from your KINTO Flex account</p>
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Legal basis for processing: Since the activation of the KINTO Flex account is necessary in order for you to use our services, such examinations will need to be carried out. You will always be notified if your account cannot be activated. Following such rejection, you may at all times contact us in order to solve these questions or receive an explanation as of why you cannot use a KINTO Flex account.

Retention period: If your account request is rejected, your Registration Data and Account Information will only be retained for the time necessary for us to manage potential claims between you and ourselves.

Step 2 – Using KINTO Flex

1. Using KINTO Flex

Categories of personal data and description of processing: KINTO uses your Registration Data and Account Information so that you can create and manage reservations. Your Registration Data and Account Information is used in the following ways:

- Administration of reservation history and reservation requests (for example vehicle preference including the vehicle identification data, use of the fuel card to identify non-permissible fuelling in accordance with the Terms of Use and in order to prevent fraud, meter settings of the vehicle before and after the rental, potential registered damage reports or reports on loss of vehicle, date and time for the reservation and distance);
- On-going reservations (for example time and date for delivery/collection, registration of damages reported by you or found in the returned car);

Purpose of processing: The information above constitutes your “User Information”. The User Information is used to manage your reservations and ensure that the use of KINTO Flex is conducted according to contract. This includes ensuring that the rented vehicle is returned to the right place and in order to register new damages which you report via the phone to your dealer and which may lead to an insurance claim.

Legal basis for processing: The processing relies on the performance of the contract, as processing this data is necessary in order to perform the car sharing contract you enter into with us.

Data retention: your data will be retained until the car sharing agreement is terminated and for an additional 90 days in order to establish, exercise or defend any legal claims. We might keep your data longer to comply with legal obligations such as replying to requests from authorities including the Belgian Transport Agency's or the Belgian Police.

Summarising table – When using the KINTO Flex service	
➡ <i>What personal information do we collect about you? ("User Information")</i>	Your vehicle preferences Your reservation details (past reservations, reservation requests and ongoing reservation) Travelled distance Damage reports Parking fines
➡ <i>How do we collect your personal information?</i>	You provide us with your data Your chosen vehicle provides us with its data Traffic control and parking systems Claim handlers
➡ <i>What do we use your personal information for?</i>	To manage your reservations and ensure that the KINTO Flex is conducted according to the contract To administer payments and refunds To provide customer support service To provide you with options for available car models that fit into your preferences To administer the return of the car or its change To deliver your car (if you choose Delivery option) or to provide a choice of dealers' locations, available for a car collection To ensure the rented vehicle is returned to the right place To register new damages which you report to your dealer via the phone Quality control and service improvement

Step 3 – KINTO Flex assistance

Categories of personal data and description of processing: Through KINTO Flex we provide you support 24 hours a day, 7 days a week. In order to communicate with you in an efficient way, we use your Registration Data, Account and User Information. For example, we may need to know how long your reservation is, or how long have you been driving for, or need access to your reservation history to help you with current

reservations and the picking up of vehicles. We also need to be able to contact you when your dealer registers new damages either reported by you over the phone or found in your returned car.

Legal basis for processing: The processing is necessary to ensure that you use KINTO Flex in a satisfactory way and that damages on our vehicles are reported.

Data retention: Your data will be retained until the car subscription agreement is terminated and for an additional 90 days in order to establish, exercise or defend any legal claims. We might keep your data longer to comply with legal obligations such as replying to requests from authorities including the Belgian Transport Agency's or the Belgian Police.

Step 4 – Cancelling your KINTO Flex account

Categories of personal data and description of processing: You may terminate your active subscription service with us by contacting us, and your agreement will then be terminated the following turn of the subscription period duration. In some cases, KINTO may have the right to immediately terminate your car subscription contract with you, for example if you have never used the service. KINTO uses your Account Data in order to terminate your subscription as described above.

Legal basis for processing: The processing is necessary in order for us to provide you your membership subscription and fulfil the car sharing contract entered into between you and us.

Data retention: If KINTO terminates the car subscription contract, KINTO will retain your personal data for a period of 90 days in order to establish, exercise or defend any legal claims. We might keep your data longer to comply with legal obligations such as replying to requests from authorities including the Belgian Transport Agency's or the Belgian Police.

Step 5 – Our communication with you

Categories of personal data and description of processing: KINTO use your Registration Data, Account and User Information to communicate with you for the following purposes:

- to keep you updated (through mail or so-called push messages) on your use of the Web Portal, e.g. notification of upcoming reservations, end of reservation, expiration of your documents etc.;
- to inform you of updates to the Terms of Use and this Privacy Notice;
- to respond to any queries you may have relating to KINTO's use of your personal data accurately and promptly;
- to make changes you have requested to your Account Data;
- to survey you on your user experience of KINTO Flex;

- to ask you if you approve of processing of your personal data for marketing purposes; and
- to support our sales and marketing activities.

Legal basis for processing: For direct marketing (e.g. by telephone, email and text messages) where such marketing are invitations to attend events, offers and recommendations or requests to participate in marketing surveys, we will only use your personal data where you have given your specific consent for each type of marketing communication. You can give or withdraw your consent at any time by clicking on the link provided in the message that we send you, either through email or by text message.

Data retention: The processing will last from the moment you have provided a valid consent, until you withdraw it.

Step 6 – Using your personal data for other purposes

Product development and R&D: KINTO use your Account and User Information in order to:

- improve the performance of Toyota vehicles, its mobile apps, its existing products and services and in order to develop new ones.
- conduct research and development, carry out data analysis and create user group profiles from aggregated data to enhance and improve KINTO Flex and to develop new mobility services and solutions; and
- secure, maintain and support its networks, systems and applications.

The abovementioned personal data is only processed to a limited extent and during the period required to transform such personal data into aggregated data. The legal basis KINTO rely on to process your Account and User Information for the abovementioned purposes and for the limited processing period is the legitimate interest to be able to provide the customer collective with relevant services and to develop products and services.

Solving disputes: KINTO also use your Account and User Information if it's necessary in connection with a dispute in which they are or may become involved either directly with you or with a third party. The purpose of the processing is based on legitimate interest, as it is necessary for them or a third to solve such dispute.

2. Sharing your personal data

Within the framework of your use of KINTO Flex share your personal data with others in the following ways:

- Account and User Information is shared with [(afterhours) call centre] so that they can provide KINTO Flex support to you.
- KINTO shares your personal data with Toyota Motor Europe ("TME") in connection with their **utilisation of the technical platform** used for the provision of services relating to KINTO Flex. TME as a separate controller could

have access to the technical platform where your personal data is stored. Such access however mainly involves aggregated data.

- **Sales and marketing activities** may be carried out by other companies within the Toyota group. If this is the case, KINTO could share your personal data with such companies, but only in accordance with your marketing preferences and always as long as you have provided your consent
- If KINTO were to become involved in a dispute, we may share your personal data with other parties, or a third party such as a collection agency.
- We share your personal data with TFS BE in accordance with what is stated in Section "Activation of your KINTO Flex account" above.
- KINTO use external service providers in connection with the development, marketing and provision of KINTO Flex. These service providers may, in certain cases, obtain access to your personal data when providing services to KINTO. For example, we use external service providers to support and maintain the IT systems, platforms and applications that are needed to provide the KINTO Flex service. All our service providers are bound by strict obligations regarding confidentiality and data security in accordance with GDPR. In such cases where our service providers process personal data about you, on our behalf, we enter into data processing agreements which fulfils the requirements of GDPR with such parties.

3. Will my personal data be transferred to other countries?

Your personal data may be stored and processed by KINTO, TME as well as other Toyota companies or third-party service providers in multiple countries, including countries other than your country of residence. Your personal data may, for example, be transferred to the United Kingdom, Japan and/or the United States.

Your personal data will thus be transferred to countries located outside of the European Economic Area ("EEA"). Such transfer will only occur where there are an adequate level of protection in the relevant country, or if appropriate safeguards in place, such as, Binding Corporate Rules, or Standard Contractual Clauses, in order to protect your integrity and ensure that the processing of your personal data is made in a way corresponding to the requirements of GDPR, including technical, organisational and legal safeguards.

For further information on how we protect your integrity when transferring personal data to third countries, please contact us as specified in Section "*How can I exercise my privacy rights?*" of this Privacy Notice.

4. What are my rights in relation to my personal data?

According to the GDPR, you have certain rights in relation to our processing of your personal data for the purpose of KINTO Flex.

- *Information:* You have the right to obtain concise, transparent, intelligible and easily accessible information about how we use your personal data and your

rights related thereto. This is in part why we are providing you with the information in this Privacy Notice.

- *Access to personal data:* You have the right to access your personal data, for example to confirm our use in accordance with law.
- *Rectification:* You are entitled to have your personal data rectified if they are inaccurate or incomplete.
- *Erasure:* You have a 'right to be forgotten'. This means in short that you, subject to certain conditions, can request the deletion or removal of your personal data where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, where you have withdrawn your consent or where we have no compelling legitimate grounds for the processing which override your interests, rights and freedoms in relation to your personal data.
- *Restriction of processing:* You have, subject to certain conditions, a right to block or prevent further use of your personal data. When processing is restricted, we can still store your personal data, but our use of your personal data will be restricted.
- *Data portability:* Subject to certain conditions, and insofar it does not affect the rights and freedom of other data subjects, you have the right to digitally obtain personal data that relate to yourself and have such personal data transferred to another data controller. The right can for example be used when you have provided us with personal data for the purpose of performing a contract with you and facilitates for you to move, copy or transfer your personal data easily between our IT systems or to external data controllers, without affecting its usability.
- *Objections to processing:* Where the processing is based on our legitimate interest, you have the right to object to such processing unless we have a compelling and legitimate reason to continue processing your personal data. You may at all times object to the processing of your personal data for direct marketing purposes.
- *Complaints:* You have the right to lodge a complaint about the way we handle or process your personal data with the [Belgian] Data Protection Authority ("DPA"). Such complaint is lodged by way of completing a FORM that is available at the www.dataprotectionauthority.be and that is sent by email to support.flex@kinto-mobility.be.
- *Automated decision making:* As a main rule, you have the right not to be subject to a decision that is based solely on automated processing (including profiling) and that produces legal (or similarly significant) effects to you. Please see further information below in Section "Rejection of activation of KINTO FLEX account".

5. How can I exercise my privacy rights?

KINTO is the responsible party for collecting and processing of your personal data (data controller) and we ask you to send all requests regarding exercising your privacy rights to KINTO. If needed, Toyota will then contact the appropriate responsible persons within

KINTO Flex or other companies within the Toyota group (including TME) with whom we might share your personal data, in order to manage your requests, questions and complaints.

You may contact us through our data protection contact person: Danny Meulenberghs
You may also contact us on the following address: Leuvensesteenweg 369, 1932 Zaventem.

Your requests will be answered as soon as reasonably practicable and always in accordance with the applicable time periods set out in the GDPR. When you contact us, we may ask for further information necessary for us to verify your identity. The purpose of such request for additional information is to ensure that we do not provide you with information on other data subjects than yourself, which would be a violation of the GDPR. Please note that even though you have requested the erasure of your personal data, there may still be a need to retain certain personal data if required or authorised by law.

6. Keeping your personal data accurate and up to date

It is important that the personal data that we hold about you is always accurate, complete and up to date. You can rectify some of your personal data directly through the Web Portal. In some cases, you may need to, due to technical reasons, contact our customer service in order to rectify personal data. For any other request, please contact us as specified in Section *"How can I exercise my privacy rights?"* of this Privacy Notice.

7. Changes to this Privacy Notice

This Privacy Notice will be updated from time to time. Our application and web portal will always display the current version, and by ticking the tick-box, we will be assured that you have taken part of the most recent version. If you have any questions regarding any changes to this Privacy Notice, please contact us as set out in Section *"How can I exercise my privacy rights?"* above.