Privacy Notices for the Digital Extras

Version 25-02

At Mercedes-Benz México, S. de R.L. de C.V. (Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348) we appreciate your interest in our products and services. These privacy notices apply to the processing of your personal data when you use the Mercedes-Benz Digital Extras (hereinafter also referred to as "services") in your vehicle. The Digital Extras are available in Mercedes-Benz vehicles of certain model series that are connected or connectable. Further, general information on data processing can be found in our Privacy Policy.

We take the protection of your personal data very seriously and want you to feel comfortable when using our products and services. We therefore take your privacy into account at all times as part of our business processes and process your personal data exclusively in accordance with the data protection regulations of the country in which the entity responsible for data processing is located (see section 1.1). Our technical and organizational security measures are also regularly reviewed and continuously improved in line with technical progress.

In **Part 1 (General Section)** of this privacy notice you will find information that applies to the entire range of Digital Extras, regardless of the specific Digital Extra in question. Further information on additional specific data processing for each Digital Extra can be found in **Part 2 (Individual Digital Extras)** of this privacy notice. Terms used are explained in the **glossary (section 3)**.

1. General Section

1.1 Controller & Data Protection Officer



The **controller** for the processing of your personal data in connection with the Digital Extras is Mercedes-Benz México, S. de R.L. de C.V., Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348 (hereinafter "**Mercedes-Benz**" or "**we**"/"us").

Our Data Protection Officer is:

Group Data Protection Officer Mercedes-Benz Group AG HPC W079 70546 Stuttgart (Germany)

Email: data.protection@mercedes-benz.com

1.2 Whose data do we process?



As part of the Digital Extras program, we process personal data of vehicle users who register with Mercedes-Benz and accept the Terms of Use for the Digital Extras ("customers"). We also process personal data of other vehicle users who authorize the customers as "co-users" of the vehicle ("co-users").

As the Digital Extras are offered by us for use in Mercedes-Benz vehicles, we may also process data of persons who drive a Mercedes-Benz vehicle in which Digital Extras are activated but are not registered/logged in as a customer or co-user ("other vehicle users").

In accordance with the Terms of Use, customers are obliged to inform co-users and other vehicle users about the Digital Extras used in the respective vehicle and the associated data processing (and, if applicable, about the possibility of deactivating Digital Extras) and to obtain any necessary consent.

1.3 What categories of data do we process, for what purpose and on what legal basis?

Processing purpose	Data categories	Legal basis
Registration for Digital Extras	Name, contact details, authentication data	Contract fulfillment*
Linking and connection of Mercedes me ID and back end with vehicle to use Digital Extras Current connection to transfer data	VIN, vehicle connection status, status of the Digital Extras, other data processed as part of the relevant, individual Digital Extras	Contract fulfillment*
for Digital Extras) during use		
Use of voluntarily provided data in the Mercedes me ID for further personalization of the Digital Extras	Optional Mercedes me ID data	Contract fulfillment*
For infotainment systems with pro- file management: Creation of a user profile and transfer to the ve- hicle for user-based storage of set- tings	Mercedes me ID data, optional Mercedes me ID data, vehicle set- tings	Contract fulfillment*
Exchange/update of data between the Mercedes me ID and activated Digital Extras for the respective contract fulfillment	Mercedes me ID data, optional Mercedes me ID data, data pro- cessed as part of the individual, relevant Digital Extras	Contract fulfillment*
Regular or event-related connection establishment between vehicle and back-end to determine and, if necessary, save the last connection and activation status of some Digital Extras and deactivation/activation, updating of Digital Extras	VIN, identification of the Digital Extras concerned, activation status (activated/deactivated) and period of activation	Contract fulfillment*; consent as required
Software updates	VIN, contact data, authentication data, Mercedes me ID data, wallbox data, software status data (e.g. software configuration)	Contract fulfillment*
Customer service	Contact details depending on the customer's request and/or the communication channel chosen by the customer	Contract fulfillment*
Data processing based on consent (e.g. contribution to the improvement of vehicle functions/voice control)	Data that is the subject of the respective consent	Consent
Needs-based design, quality improvement, optimization and further development of Digital Extras	Usage data, vehicle data	Legitimate interest Our legitimate interest lies in the needs-based further development and improvement of the overall

		range of Digital Extras and products such as vehicle functions.
Business management within the Group	Usage data, vehicle data	Legitimate interest
Стоир		Our legitimate interest lies in the development of business strategies and the definition of sales and marketing targets.
Scientific purposes, informing the	Usage data, vehicle data	Legitimate interest
public about the Digital Extras		Our legitimate interest lies in the support of research projects with e.g. universities and research institutes, in general publications and in association work.
Proper system operation, in particular with regard to information se-	Information security data, other relevant data processed as part of the	Contract fulfillment*, legitimate interest
curity and data protection (Protection of customer (data),	respective Digital Extras	Our legitimate interest lies in protecting our systems from unauthor-
third parties, vehicles, vehicle systems, back-end systems and other IT infrastructure)		ized access and manipulation at- tempts and ensuring proper system operation, including theft protection, by detecting and analyzing possible attacks and malfunctions at an early stage.
Prevention and analysis of violations of the Terms of Use/improper	Information security data, other relevant data that is processed as	Contract fulfillment*, legitimate interest
or unauthorized use of Digital Ex- tras	part of the respective Digital Extras and may indicate misuse	Our legitimate economic interest lies in ensuring the proper and contractual use of our Digital Extras.
Assertion, exercise and defense of	Information security data, other rel-	Legitimate interest
legal claims	evant data processed as part of the respective Digital Extras	Our legitimate interest lies in being able to properly safeguard our legal interests.
Anonymization	All personal data processed as part	Legitimate interest
	of the Digital Extras	Our legitimate interest in anonymizing your personal data is to use the anonymized data for the further development and quality assurance of the Digital Extras, to pass on the anonymized data to third parties/recipients and to develop Digital Extras for them.

^{*} If personal data of other vehicle users is processed by Mercedes-Benz, the legal basis is not the fulfillment of the contract, but rather our legitimate interest in fulfilling our contractual obligations to provide the Digital Extras to the customer or co-user (Art. 6 (1)(f) GDPR). The same applies to the processing of personal data of vehicle users to whom the vehicle was provided by one of our B2B customers. In this case, our legitimate interest lies in fulfilling our contractual obligations to provide the Digital Extras to the B2B customer (Art. 6 (1)(f) GDPR).

1.4 Who do we share your data with?



We pass on your data to third parties and processors if and insofar as this is necessary for the provision of the Digital Extras you use and for the operation of the Digital Extras.

This includes, but is not limited to, the national Mercedes-Benz sales company responsible for you, Mercedes-Benz branches and other authorized dealers commissioned with the sale of Digital Extras as well as service partners, roadside assistance companies, third-party content providers and third-party providers selected by you. We also use external (IT) service providers.

As part of the needs-based design, quality improvement, optimization and further development of Digital Extras, we transmit the data required for this to internal Group development companies.

We also pass on your data to third parties if you have explicitly consented to this or have selected the relevant third-party providers yourself.

We pass on personal data to courts and authorities in connection with the assertion, exercise or defense of legal claims. Disclosure to the relevant bodies is also possible if this is necessary in individual cases due to a mandatory legal provision, court decision or official order, in particular in the context of official requests for information.

If we transfer your data in the context of the provision of Digital Extras to natural or legal persons other than the above-mentioned persons as the aforementioned "standard recipients", you can see this in **Part 2 (Individual Digital Extras)** for the respective Digital Extra in the "Recipient" column. If we transfer data to recipients but the data is anonymized beforehand, i.e. you cannot be identified by the recipient, the recipient is not listed as a recipient. You can object to the forwarding of anonymized data at any time (e.g. via the Data Protection Center).

1.4.1 Sharing fuel consumption data with the European Commission

We are legally obliged (Art. 6 (1)(c) GDPR in conjunction with Article 9 (3) of Regulation (EU) 2021/392) to pass on consumption information of vehicles registered in the EU since January 1, 2021 to the EU Commission for the purpose of verifying real-world consumption values. If consumption data is recorded as part of the Digital Extras, the consumption data available for a calendar year is stored in connection with the VIN and then passed on to the EU Commission. We do not process this data for any other purposes and delete it immediately after it has been transferred to the EU Commission (unless storage is necessary for other purposes mentioned in this privacy notice). You have the right to deny the aforementioned transfer of your data to the European Commission at any time. The refusal is without prejudice to the lawfulness of the processing pursuant to our legal obligation until the time of your refusal.

1.5 Where is your data processed?



We process your personal data both in the European Union/the European Economic Area and also in what are referred to as third countries.

If your data is transferred to other companies in the Mercedes-Benz Group, we comply with binding internal data protection regulations (known as "Binding Corporate Rules", Art. 47 GDPR) to ensure an adequate level of data protection.

Service providers that process personal data on our behalf in third countries (e.g. cloud providers, see section 1.4), are only used if an adequacy decision has been issued by the European Commission for this third country (Art. 45 (1) GDPR) or suitable or appropriate safeguards are in place at the recipient (Art. 46 GDPR). We ensure the existence of suitable guarantees in particular by concluding EU standard contractual clauses or binding corporate rules.

We also transfer personal data to recipients in third countries if this is necessary for the performance of our contract for the provision of the Digital Extras (Art. 49 (1)(b) GDPR). In particular, these may be service partners, roadside assistance companies, third-party content providers and third-party providers selected by you.

To obtain further information or a copy of the appropriate or adequate safeguards, you can contact us at any time using the contact details provided in section 1.7.3.

1.6 How long do we store your data?



We store personal data of customers and co-users as long as this is necessary for the fulfillment of our contractual obligations (provision of the Digital Extras).

After the termination of the respective contractual relationship, the data will be stored in accordance with tax and commercial law retention regulations and deleted after expiry of the corresponding retention periods, unless further storage is necessary for the purpose of asserting, exercising or defending legal claims.

Subject to deviating information in **Part 2 (Individual Digital Extras)** of this privacy notice, only the data of the last event is stored by the vehicle as part of the provision of the Digital Extras. As soon as a new event arrives in the back-end, the data from the older event is overwritten.

Some Digital Extras or functions of Digital Extras can be deactivated independently by the customer. If a customer deactivates a relevant Digital Extra or function, the deletion process for the associated data is triggered and this data is deleted in our back-end in the scheduled deletion cycle. The deletion process is also triggered when the link between the vehicle and the back-end and the Mercedes me ID is removed. However, if the processing of the respective data is still required for other purposes, the data will continue to be processed in accordance with this privacy notice. This may be the case, for example, if a Digital Extra is deactivated, but the data is processed as part of another Digital Extra that is still activated (see **Part 2 (Individual Digital Extras))** or for the purposes mentioned in section 1.3.

The customer can deactivate the transmission of geolocation data to Mercedes-Benz, where the customer or a third party can view the geolocation, in the settings of the infotainment system in the vehicle for Digital Extras. In this case, the geolocation data for these Digital Extras is no longer available, so they only work to a limited extent. Regardless of this setting, geolocation data is collected regularly (at least every two hours) to determine the nearest regional back end but is deleted immediately after the determination is complete.

1.7 Your Rights & Customer Service Center



As a data subject, you have the following rights in relation to the processing of your personal data. To exercise your rights, you can contact us using the contact details provided in section 1.7.3.

1.7.1 Rights of the Data Subject

- Right of access (Art. 15 GDPR): You have a right to information about your personal data processed by us.
- Right to rectification (Art. 16 GDPR): You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you and the completion of incomplete personal data.
- Right to erasure (Art. 17 GDPR): You have the right to demand from us the erasure of personal data concerning you without undue delay if one of the grounds set out in Art. 17 (1) GDPR applies. By way of exception, the right to erasure does not apply if the processing is necessary on the grounds set out in Art. 17 (3) GDPR. This may be the case, for example, if the processing is necessary to fulfill a legal obligation or to assert, exercise or defend legal claims.
- Right to restriction of processing (Art. 18 GDPR): You have the right to demand from us the restriction of processing where the accuracy of the data is contested by you, the processing is unlawful but you oppose the erasure of the data and we no longer need the data, but you require it for the

assertion, exercise or defense of legal claims or for which you have objected to processing pursuant to Art. 21 GDPR.

- Right to data portability (Art. 20 GDPR): You have the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format, or to request that it be transmitted to another data controller.
- Right to withdraw consent (Art. 7 (3) GDPR): If the processing is based on consent pursuant to Art. 6 (1)(a) or Art. 9 (2)(a) GDPR, you have the right under Art. 7 (3) GDPR to withdraw your consent at any time. Revoking consent will not affect the legality of the processing undertaken on the basis of the consent granted until the revocation. The activation of some Digital Extras may require your separate consent. You are not obliged to grant it and you are entitled to revoke it at any time; in such cases, you will not or will no longer be able to use these Digital Extras.
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR): As a data subject, you have the right to lodge a complaint with a supervisory authority.

1.7.2 Right to object (Art. 21 GDPR)

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 (1)(f) GDPR, you have the right, pursuant to Art. 21 GDPR to object to the processing of your personal data on grounds relating to your particular situation or if the objection is directed against direct marketing. In the latter case, you have a general right to object, which will be implemented by us without specifying a particular situation.

1.7.3 Possibility to contact us

You can contact our **Customer Assistance Center** at any time:

Mercedes-Benz México, S. de R.L. de C.V.

Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348

Phone: 800-0024-365 (toll-free from a landline. Cell phone charges may vary)

1.8 Changes to this privacy notice

Changes to the privacy notice may become necessary, for example, due to the new or further development of Digital Extras or the overall range.

2. Individual Digital Extras

In this Part 2 of our privacy notice, you will find information on specific data processing in the context of our individual Digital Extras. The general information on data processing listed in Part 1 (in particular the categories of data processed) also applies to the Digital Extras listed below. The information provided below merely supplements this.

We only transfer such personal data to the recipients named in this Part 2 whose processing is necessary for the respective service provided by the recipient as part of a Digital Extra. To obtain further information on the recipients, you can reach us using the contact details above.

We process the personal data mentioned in this Part 2 in order to fulfill the respective contracts concluded with you (Art. 6 (1)(b) GDPR). For the best possible overview, we have sorted the Digital Extras into the subject areas you are already familiar with from the order.

2.1 Electric Drive / Charging and Consumption

2.1.1 Charging Station Overlay

<u>□</u> Data categories	Duration of storage	⊚ ⊕ Recipients
Geolocation data, selected map section, navigation data, technical charging requirements of the vehicle (e.g. charging cable plug type, max. charging capacity), charging history, filter criteria for the charging station search	Charging processes at personal charging stations are stored for a maximum of 2 years Customer ratings: No storage by Mercedes-Benz	Mobility provider that provides customer ratings for charging stations
"Personal charging stations" function: The personal charging station infor- mation stored by the customer via vari- ous accesses for use, such as name, address and category of the charging station		
"Filter charging stations" function: Filter criteria selected by the customer, geolocation data		
"Charging history" function: VIN, geolocation data, other vehicle data such as odometer reading, ignition status, battery state of charge, battery size, charging capacity and ambient conditions (e.g. outside temperature)		
When the Mercedes me Charge service is activated: State of charge, contract tariff data, ratings of the charging stations by the customer		

2.1.2 Individual Consumption

Data categories	Duration of storage	⊜ ③ Recipients
Trip data and mileage relating to the vehicle's last trip since the trip computer was reset and over the entire service life of the vehicle, ECO score per trip, equipment data	30 days, beyond that storage in anonymized form for the purpose of improving the Digital Extras, vehicle functions and for publica- tions	Standard recipients in accordance with 1.4

2.1.3 Mercedes-Benz Wallbox (MB Wallbox)

⋈≡	Data categories	0	Duration of storage	₽ €	Recipients
charging	s me ID data, wallbox data, transaction data, energy price ctricity provider	stored	ng transaction data is for a maximum of 2 years. ustomer deletes their Merme ID or removes the		provider for activa- e and deactivation ervice

wallbox from the Mercedes me ID, all data will be deleted	

2.1.4 Mercedes-Benz Eco Coach

Data categories	Duration of storage	Recipients
reading, consumption, remaining range, weekly and monthly averages, bonus points (per year and cumulative total points)	Weekly and monthly averages and bonus points: max. 3 years Otherwise 4 weeks for the purpose of display in the app and 6 weeks for customer support Storage of only the most recent geolocation data	Standard recipients in accordance with 1.4

2.1.5 Mercedes me Charge

□ □	Duration of storage	Recipients
Name, contact details, VIN, CIAM ID, language setting, country, charging station ID, status and charging information, charging transaction data	Standard storage period in accordance with 1.6	Mobility services provider
Additionally from the mobility service provider: contract number, other contract data, esp. charging transaction data, tariff details)		

2.1.6 Plug & Charge

Data categories	Duration of storage	⊜ ③ Recipients
VIN, name, contact details, CIAM ID, contract data (e.g. vehicle type, tariff details, contract number), vehicle customer certificate, contract certificates, geolocation data	Standard storage period in accordance with 1.6	Mobility services provider, certificate pool operator/public key infrastructure operator

2.1.7 Reservation of charging stations in the Mercedes-Benz fast-charging network

Data categories	Duration of storage	⊚
Contract data, approximate geolocation data, time stamp	For the duration of the reservation – max. 30 minutes	Mobility services provider

2.1.8 Range Display

Data categories	Duration of storage	⊚
When navigation is activated: VIN, geolocation of the vehicle, data for calculating the electric range, such as settings made in the vehicle or in the app for electric vehicles, data on the status of the high-voltage battery, language settings.	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.1.9 Battery management

⋈≡	Data categories	0	Duration of storage	₽® Re	ecipients
•	dentification, battery status, eive confirmations	Maximum	n 24 months	Standard cordance	recipients in ac- with 1.4

2.2 Entertainment

2.2.1 Mercedes-Benz Stories Online functions

∑ ≡ Data categories	Duration of storage	⊚ →③ Recipients
VIN, Mercedes me ID data, profile information (name, user name, bio, profile link), commands executed via various user accesses (e.g. start of a download), video recordings (recorded by InCar camera, dashcam and/or smartphone camera), edited video recordings (socalled hotlap and highlight videos) incl. designation of the video recording and automatically generated texts, telemetry data, layout information in the form of geoposition data Function offering individual information, recommendations and announcements in the infotainment system or via the MBUX Voice Assistant: Route information, race track boost zones, special highlights, geoposition data, the expected route to be covered Ridesharing function: If applicable, public links to video recordings, route ID, route name, time required for the route	If the customer deletes shared routes, moments or experiences, the link between the respective stored data and the Mercedes me ID and other personal data is irrevocably removed. In order to maintain the ranking lists and events, and to enable other users to continue to travel the routes and compare them with previous trips, the anonymized route information and telemetry data will continue to be stored and displayed. If customers load routes into their vehicle or into the memory of their smartphone, route data is processed but Mercedes does not store any personal data.	Standard recipients in accordance with 1.4
Ranking list function: Rank per completed route, potential for improvement in comparison with other users, route ID,		

2.2.2 Comfort Data Volume

Data categories	Duration of storage	₽ ③ Recipients
Name, contact details, Mercedes me ID data, date of birth, country, IMSI	Standard storage period in accordance with 1.6	Cell phone network pro- vider

2.2.3 Augmented Radio

≥≡	Data categories	0	Duration of storage	₽ 3	Recipients
VIN, curre	ently listened to radio sta- nel		d storage period in ac- e with 1.6		rd recipients in acce with 1.4

2.2.4 Radio Service Following

Data categories	Duration of storage	©-③ Recipients
VIN, currently listened to radio station	Data are stored as long as the radio station is being listened to and are deleted when the radio station is changed/the radio is switched off	Standard recipients in accordance with 1.4

2.2.5 Internet Radio

౭≡	Data categories	Duration of storage		Recipients
ε¢	VIN, authentication data, language setting, country, search query, radio favorites	When the user account in the vehicle is deleted, the link to the content provider is also deleted	Content	t Provider
destir data,	station search in the vehicle and nation environment: Geolocation navigation data, 10 most recently ed to radio stations			

2.2.6 MB Apps

<u>⊠</u>	Data categories	0	Duration of storage	₽ 3	Recipients
See infor	mation on the respective apps	See inf apps	ormation on the respective	See info	ormation on the re- e apps

2.2.7 Online Music

Data categories	Duration of storage	₽ Recipients
Authentication data, information about search, selection and current playback of music content	Until cancellation of the music account in the vehicle or in the event of cancellation of the Mercedes me ID, as in this case the linked music account will also be deleted	Music provider

2.2.8 Video Streaming

∑ ≡ Data categories	Duration of storage	Recipients
Mercedes me ID data, VIN, equipment data, language setting, current region and country in which the vehicle is located	Standard storage period in accordance with 1.6	Video streaming provider

2.3 Guard 360

2.3.1 Stolen Vehicle Help

Data categories	Duration of storage	⊜ ③ Recipients
Only in the event of a theft report: VIN, name, date of birth, authentication data, license plate number, file number of the theft report, last geolocation data (if information is available) Optional: Processing police station, regularly geolocation data, odometer reading	VIN, start and end of tracking: Two years for the assertion, exercise or defense of legal claims Otherwise, deletion as soon as the vehicle is in the hands of police	Third-party provider for processing the theft report

2.3.2 Emergency Key Deactivation

Data categories	Duration of storage	⊚ ③ Recipients
feedback from the vehicle	If key in deactivated state: Last change of state (incl. VIN and time) up to 10 years (evidence as	Standard recipients in accordance with 1.4

part of theft protection, Art. 6(1)(f) GDPR)	
GDFK)	

2.4 Individualization/further development

2.4.1 Feedback

Data categories	Duration of storage	⊜ ③ Recipients
VIN, user data such as Mercedes me ID data, customer feedback on vehicle functions or services and surveys	6 months with VIN and customer reference, unless otherwise specified by the customer. Subsequent separation from VIN and further processing for the purpose of survey evaluation for up to 2 years.	Standard recipients in accordance with 1.4

2.4.2 Individual recommendations

Data categories	Duration of storage	⊜ ⊛ Recipients
VIN, contact data, infotainment system usage data (e.g. air conditioning settings, radio, function operation such as touchpad/language), information on technical and/or physical variables relating to the stress on the vehicle/vehicle components (e.g. acceleration/consumption values, driving time), availability of Mercedes-Benz products and/or services (e.g. activation status, duration and type of use)	3 months with VIN reference in aggregated form, then separation from VIN and further processing to form comparison groups Campaign data are stored for 3 years for arranging recommendations	Standard recipients in accordance with 1.4
Campaign data (response to recommendations such as purchase/activation, change of use)		

2.5 Convenience

2.5.1 GPS-based online information for driving functions

∑ Data categories	Duration of storage	⊜ ③ Recipients
VIN, current map section	Processing of data in the backend only during information retrieval, no further storage	Standard recipients in accordance with 1.4

2.5.2 In-Car Office

Data categories	Duration of storage	⊜ ⊛ Recipients
Authentication data (encrypted), office data (e.g. address book data, calendar data, emails), geolocation data	Office data: maximum 2 hours	Office function provider
Function "Navigation to the appoint- ment": location noted in the calendar entry		
Telephone call/conference call function: dial-in data:		

2.5.3 Digital Assistants

Data categories	Duration of storage	⊚ ₃ Recipients
Authentication data	Standard storage period in accord-	Mercedes-Benz third-party
Data from other activated Digital Extras (see respective service) is forwarded to the recipients depending on the customer's definition of the various accesses for use. Further information can be found in the privacy notice of the respective Mercedes-Benz app.	ance with 1.6	apps

2.5.4 Pre-installation of Digital Vehicle Key on the Smartphone

⋈≡	Data categories		Duration of storage	Recipients
Authentica data	ation data, vehicle data, key	Standard ance with	• .	rd recipients in acce with 1.4

2.5.5 Digital Payment for Fueling (Fuel&Pay)

Data cate	egories 👨	Duration of storage	(2)	Recipients
iD, name, co	entact data, pay- cansaction data g (e.g. invoice antity), the map	andard storage period in accord- ce with 1.6	ment se	nt processors, pay- rvice providers, ion intermediaries

2.5.6 Car Wash

2=	Data categories	0	Duration of storage	₽ 3	Recipients
amou sectio	VIN, CIAM ID or Mercedes me ID, name, contact data, payment data, transaction data relfor invoicing (e.g. invoice nt and wash program), the map on opened in the vehicle or on obile device	Standard ance with	storage period in accord- n 1.6	ment se	nt processors, pay- ervice providers, in- aries of the car roviders

2.5.7 ENERGIZING COACH

Data categories	Duration of storage	⊜ ③ Recipients
Authentication data, vehicle data (e.g. driving time, time since last ENERGIZING COMFORT program, for infotainment systems with profile management: inside and outside temperature) When linked to a wearable and the necessary consent is given (Art. 6 (1)(a) GDPR): wearable data (sleep data, stress level) data of the "Car-to-X Communication" service if activated	Vehicle data: one day Stress level: one hour Otherwise for a maximum of 1 month or when logging out in the app Authentication data from the third-party provider is deleted when the link to the third-party provider account is removed.	Wearable providers

2.5.8 MB Intelligent Drive Online Service

□ Data categories	Duration of storage	⊜ ₹ Recipients
VIN, approximate geolocation data for map data and route clearance query, region-specific correction data, time stamp, speed, events that indicate system malfunctions or are relevant for the assessment or adjustment of the route clearance (system crashes, system behavior in hazardous situations, technical faults, map errors), region-specific correction data, data from the "Car-to-X Communication" and "Live Traffic Information" services if activated	Intermediate storage of approximate geolocation data only for the period of the map data and route clearance query Processing of data in the back-end separated from the VIN Function MB Drive Pilot VIP Service: Storage for up to two weeks	
Depending on the event: trip data, system status, environmental data (e.g. outside temperature, visibility conditions), road conditions (such as wet conditions), traffic infrastructure		

data (such as traffic signs, roadworks)

Function MB Drive Pilot VIP Service: Events that indicate a malfunction of the system or are relevant for the assessment or adjustment of the route clearance (e.g. system crashes, system behavior in hazardous situations, technical malfunctions, card errors) and the above-mentioned event-specific data, contact data (processing also for the purpose of analyzing technical operating procedures, Art. 6 (1)(f) GDPR)

2.5.9 MBUX Voice Assistant, LINGUATRONIC Online Voice Control

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Data categories



Duration of storage



Recipients

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Audio data, data required to answer the voice query (e.g. geo-

location data, currently playing music, language setting), voice profile

Messaging and dictation functions (to improve the customer's individual speech recognition), if activated:
Names from address books of end devices connected to the vehicle

Smart Home function: Mercedes me ID data Smart Home data (e.g. status of smart home devices, customer actions)

"Newsflash" function: The requested content of the message service providers, CIAM ID, subject to the customer's consent (Art. 6 (1)(a) GDPR) also preferred message service providers / categories stored by the customer

"Advanced (AI) voice assistant" function: Additional context data (in particular information on topics of conversation), results of the online search engine query based on the voice request

3 months after the last voice request, provided that the Digital Extra is not deactivated, which leads to prior deletion.

Security-relevant Smart Home data (e.g. remote control of power outlets): 2 years

Other Smart Home data: 12 months or by unlinking the Smart Home third-party provider account

Context data as part of the use of the "Advanced (AI) voice assistant" function: up to 1 hour per voice request

Voice service providers (with the exception of data from the messaging and dictation functions) (if the customer's consent "Contribution to improving voice service" has been obtained: joint controllership for data processing for this purpose)

Smart Home providers, if applicable

News providers, if applicable

Online search engine providers, if applicable

Al providers, if applicable

2.5.10 Global Search

	Duration of storage	₽ ③ Recipients
Search term, geolocation data, search context data (e.g. destination address, lan- guage setting), data from other Digi- tal Extras activated by the customer, results of previous searches	Results of past searches: Two hours	Third-party provider for carrying out the search

2.6 Navigation

2.6.1 Display of and search for special destinations

Data categories	Duration of storage	⊜ ③ Recipients
Selected map section/location to be searched, categories of points of interest activated via various accesses for use	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.2 Car-to-X Communication

<u>S</u>	Data categories	0	Duration of storage	₽ 3	Recipients
⊆? ually	Geolocation data for hazard- ous situations, either rec- orded by the vehicle or man- sent by the vehicle user	without vehicle sented	r processing in the back-end reference to the customer or unless the customer has con- to "Contribution to improving functions"		

2.6.3 Shared Navigation

□ □	Duration of storage	⊜ ③ Recipients
Session ID, geolocation data, navigation data, mobile phone number of the customer, mobile phone number of the contact with whom the navigation is shared	Standard storage period in accordance with 1.6	Map provider

2.6.4 Hybrid Navigation for Green Zones

⋈≡	Data categories	Duration of storage	⊜ ₃ Recipients
ξÇ	VIN, data for calculating the electric range, navigation data, language settings,	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

country, profile data, emission class,	
geolocation data	

2.6.5 Last Mile Navigation

⋈≡	Data categories	Duration of storage	⊜ ⊕ Recipients
ε¢	Geolocation data, navigation data, terminal device data for connection to the vehicle	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.6 Live Traffic Information

<u>S</u>	Data categories	Duration of storage	⊜ ③ Recipients
₽	GPS data	Further processing in the back-end without reference to customer or vehicle	Standard recipients in accordance with 1.4

2.6.7 Local Search

<u>□</u> Data categories	Duration of storage	⊜ ⊛ Recipients
Additionally for infotainment systems without profile management: Last 10 search terms and favorites selected by the customer and, if applicable (depending on vehicle type), additional (stopovers) destinations and current route	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.8 Navigation for Trailers and Oversized Vehicles

□ □	☐ Duration of storage	⊚ ③ Recipients
VIN, data for calculating the electric range, language settings, country, geolocation data, navigation data, vehicle and/or trailer data stored via various accesses for use, such as dimensions and permissible gross mass	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.9 Navigation with Electric Intelligence

∑ ≡ Data categories	Duration of storage	⊜ ③ Recipients
VIN, Mercedes me ID, navigation data, data for calculating the electric range, language	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

settings, country, profile data, consumption-relevant average values of a trip, geolocation data	
	l

2.6.10 Online Map Update

⋈≡	Data categories	0	Duration of storage	Recipients
VIN, reg	ion in which the vehicle is lo-	14 days (p	oseudonymized)	rd recipients in ac- ce with 1.4

2.6.11 Online Routing

□ Data categories	Duration of storage	⊜ ⊛ Recipients
VIN, data for calculating the electric range, language settings, country, geolocation data, navigation data	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.12 Route Planning

⋈≣	Data categories		Duration of storage	Recipients
β	Geolocation data, current range of the tank or battery	Storage of location date	j	rd recipients in ac- ce with 1.4

2.6.13 Satellite images

□ □	Duration of storage	⊜ ③ Recipients
Selected map section	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.14 Fuel Station Prices

∑≡ Data categories	Duration of storage	⊜ ₃ Recipients
Selected map section	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.15 Traffic restriction

2=	Data categories	Duration of storage	⊚ ③ Recipients
⊆ Ø	VIN, emission class, geolocation data, navigation data	Standard storage period in accordance with 1.6	Standard recipients in accordance with 1.4

2.6.16 Weather

2=	Data categories	©	Duration of storage	Recipients
₽	Geolocation data, map section, customer favorites	Standard ance with	.	rd recipients in acce with 1.4

2.7 Parking

2.7.1 Valet Service Mode

<u> </u>	Data categories	0	Duration of storage	Recipients
	s me ID, valet service activa- is, profile data	Saving th changes	e three most recent status	rd recipients in ac- ce with 1.4

2.7.2 Parking

Data categories	Duration of storage	⊚ ③ Recipients
Geolocation data, current position of the mobile device if applicable (depending on access for use), navigation data, free parking options detected by the vehicle sensors with corresponding measured values	Standard storage period in accordance with 1.6	Mercedes-Benz parking card function: Parking space intermediaries, parking lot providers
Mercedes-Benz parking card function (RFID card): name, RFID card number (user ID), license plate number, reservation information, data on entries and exits, invoice amount, payment data, past bookings and parking processes		
Function free parking spaces according to filter criteria: filter criteria selected by the vehicle user		

2.7.3 Parking for App/Remote Parking Assist

Data categories	Duration of storage	⊜ ③ Recipients
VIN, last reason for canceling a parking maneuver, app version	Standard storage period in accordance with 1.6	Service partners, work- shops in the event of fault
Infotainment systems with profile management: Every 10 days additional information on outdated app versions, time of the last data exchange		analysis

2.8 Remote

2.8.1 AMG ONE Remote Pre-Heating Power unit

	Duration of storage	Recipients
Programming information for auxiliary heating/pre-entry climate control, pre-heating drive system	Saving the three most recent status changes	Standard recipients in accordance with 1.4

2.8.2 Notification when driving speed is exceeded

Data categories	Duration of storage	⊜ ③ Recipients
VIN, geolocation data, set threshold value, past events, time	Storage of only the most recent geolocation data	Standard recipients in accordance with 1.4
If the "Geofencing" service is activated at the same time: Speed limits set by the vehicle user for local areas defined by the vehicle user		

2.8.3 Theft Notification and Parking Damage Detection

Data categories	Duration of storage	Recipients
Contact details, customer communica- tion, time and source of the alarm trig- ger, time, strength and direction of the impact force	Camera shots: 30 days in encrypted form (can only be decrypted by the customer)	Standard recipients in accordance with 1.4
Infotainment systems with profile management: 360-degree camera shots in encrypted form when transmission has been triggered	Other data: Two years for the assertion, exercise or defense of legal claims	

2.8.4 Digital key handover:

<u>⋈</u> ≡ Data categories	Duration of storage	⊚ ⊕ Recipients
VIN, vehicle status data (e.g. opening status of vehicle doors, windows, ignition status), key data	Two years If key in deactivated state: Last change of state (incl. VIN and time) up to 10 years (evidence as part of theft protection, Art. 6(1)(f) GDPR)	Standard recipients in accordance with 1.4

2.8.5 Remote Control, Beginner Driver Mode

Data categories	Duration of storage	₽ ③ Recipients
Mercedes me ID, activation status of beginner driver mode, profile data	Saving the three most recent status changes	Standard recipients in accordance with 1.4

2.8.6 Driving statistics

Data categories	Duration of storage	Recipients
Geolocation data, statistical data (e.g. average speed, distance, time in the vehicle)	Saving the three most recent status changes In addition, storage in aggregated form for one year	Standard recipients in accordance with 1.4

2.8.7 Vehicle Tracker

⋈≡	Data categories	Duration of storage	⊜ ③ Recipients
₽	VIN, geolocation data	Storage of only the most recent geolocation data	Standard recipients in accordance with 1.4

2.8.8 Vehicle Locator

౭≡	Data categories		Duration of storage	9 3	Recipients
⊆የ the re	VIN, geolocation data (radius approx. 1.5 km), geolocation data of etrieving mobile device	•	of only the most recent tion data		rd recipients in ac- ce with 1.4

2.8.9 Vehicle Status/Remote Status

	Data categories	Duration of storage	9 3	Recipients
vehicle stati level, avera sure), maini charge, cha forecast, loo if applicable	a, customer communication, us information (e.g. fuel ge consumption, tire prestenance interval, state of trge progress, battery charge cation of the charging station e, remote control information departure time)	Storage of the most recent status changes Security information: Two years		rd recipients in ac- ce with 1.4

2.8.10 Remote Window and Sunroof Control

		⊜ ③ Recipients
VIN, opening status of windows/sunroof, executed command incl. feedback from the vehicle	Two years	Standard recipients in accordance with 1.4

2.8.11 Geofencing

ু≣ Data categories	Duration of storage	⊜ ③ Recipients
Geolocation data, events (leaving/entering the defined area)	Storage of only the most recent geolocation data.	Standard recipients in accordance with 1.4
	Events are stored for a period of 2 years and can be deleted by the customer at any time.	

2.8.12 Mercedes-Benz Logbook

□ Data categories	Duration of storage	⊜ ④ Recipients
VIN	Individual data categories: One	Standard recipients in ac-
Per trip: Time, odometer reading, vehicle location	week up to a maximum of 31 days	cordance with 1.4
Additionally per business trip: Company/persons visited and driver	Trips created from data categories: Maximum 15 months	
Optional: Stored notes from customers or editing of trips		

2.8.13 Valet Protect

౭≣	Data categories	0	Duration of storage	Recipients
εØ	Geolocation data, ignition status start and end of trip		ge of only the most recent cation data	rd recipients in acce with 1.4

2.8.14 Personalization

Data categories		⊚ ⊕ Recipients
Mercedes me ID data, optional Mercedes me ID data, profile data Infotainment systems with profile man- agement: Automatic linking of user profile and Mercedes me ID and transfer to the vehicle (see section 1.3)	Infotainment systems without profile management: Deletion of user profiles also leads to deletion of the data in the user account if automatic synchronization is activated; depending on the vehicle type, deactivation of the service or deletion of the Mercedes me ID automatically	Standard recipients in accordance with 1.4

leads to deletion of the user profile in the vehicle	
Infotainment systems with profile management: 1 month after deactivation of the service/unlinking of the vehicle	

2.8.15 Charging Settings & Pre-Entry Climate Control

	Ouration of storage	©+3 Recipients
Contact details, customer communication, charging settings, pre-entry climate control, state of charge, charging progress, battery charge forecast, charging station location details if applicable, remote control information (e.g. preset departure time)	Storage of the most recent status changes Signal of the status message: Two years	Standard recipients in accordance with 1.4

2.8.16 Auxiliary Heating

		₽ ③ Recipients
Auxiliary Heating	Storage of the most recent status changes	Standard recipients in accordance with 1.4

2.8.17 Remote Door Lock & Unlock

<u>⊠</u> ≡	Data categories	0	Duration of storage	9 3	Recipients
•	ning status, executed command back from the vehicle	Two y	rears		d recipients in ac- e with 1.4

2.9 Technical pre-installations

2.9.1 Link to content providers

౭≡	Data categories	0	Duration of storage	₽ 3	Recipients
₽ø	Geolocation data or selected map section, search term, set search radius, language setting		lard storage period in ac- nce with 1.6		d recipients in ac- e with 1.4

2.9.2 Notification Center

으≡	Data categories	100	Duration of storage	₽ 3	Recipients
₽	Notifications from activated Digital Extras which are compatible with the Notification Center, for certain	One m	nonth (approximate posi-		rd recipients in acce with 1.4
nation	cation Center services: Sales designof the vehicle and geolocation data, and and closing of notifications				

2.9.3 Interface to Third-Party Providers

	Data categories	0	Duration of storage	₽ 3	Recipients
	Authentication data, geolocation data, information on data sharing in the customer portal, data from activated Digital Extras (depending ta sharing)		ard storage period in ac- nce with 1.6	lected b	arty providers se- by the customer in tomer portal, Mer- Benz Group com-

2.10 Maintenance, accident, breakdown

2.10.1 Remote vehicle diagnostics

Data categories	Duration of storage	© Recipients
Contact and contract data, VIN, geolocation data, workshop code/service code, service work performed, quick test data, vehicle status data (e.g. error messages, wear information on diagnostics-enabled components, maintenance status, data on accident and parking collision detection)	Standard storage period in accordance with 1.6	Mercedes-Benz Customer Assistance Center Maas- tricht N.V. (CAC), service partner selected by the customer/Mercedes-Benz workshop/technician com- missioned with roadside and accident assistance

2.10.2 Breakdown Management

요〓	Data categories	Duration of storage	⊚ ⊛ Recipients
on dia milea work	Contact and contract data, VIN, geolocation data, vehicle status data (e.g. error messages, work-code/service code, wear information agnostics-enabled components and ge, maintenance status, service performed, data on accident or park-ollision detection), whether the call	Standard storage period in accordance with 1.6	Mercedes-Benz Customer Assistance Center Maas- tricht N.V. (CAC), Mer- cedes-Benz or smart ser- vice partners, roadside as- sistance companies

	was triggered manually or automatically, further data on the vehicle status depending on the customer's request		
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2.10.3 Telediagnostics

Data categories	Duration of storage	⊜ ⊛ Recipients
Contact and contract data, VIN, vehicle condition data (e.g. error messages, workshop code/service code, wear information on diagnostics-enabled components and mileage, maintenance status, service work performed, data on accident and parking collision detection)	Standard storage period in accordance with 1.6	Mercedes-Benz or smart service partners, roadside assistance companies

2.10.4 Accident Recovery

Data categories	Duration of storage	⊜ ③ Recipients
Contact and contract data, VIN, geolocation data, vehicle status data (e.g. error messages, workshop code/service code, wear information on diagnostics-enabled components and mileage, maintenance status, service	Standard storage period in accordance with 1.6	Mercedes-Benz Customer Assistance Center Maas- tricht N.V. (CAC), Mer- cedes-Benz or smart ser- vice partners, roadside as- sistance companies
work performed, data on accident or parking collision detection), whether the call was triggered manually or automatically, further data on the vehicle status depending on the customer's request (e.g. information on an impact detected by the parked vehicle)		Insurance aggregator, if the motor vehicle insurance was linked by the customer via the Digital Extra "Interface to Third-Party Providers".
With active insurance connection: Data on the collision event such as time stamp, position of the collision and type of dam- age event, transaction data provided by the insurance company, e.g. insurance name, transaction number and insurance type.		

2.10.5 Van Uptime

<u>⋈</u> ≡ Data categories	Duration of storage	⊚ ⊕ Recipients
Contact and contract data, VIN, geolocation data, vehicle status data (e.g. maintenance and wear data, warning, error and information messages, information on component load, control unit information	Standard storage period in accordance with 1.6	Mercedes-Benz service partners, roadside assistance companies

2.10.6 Service Management

Data categories	Duration of storage	⊜ ₃ Recipients
Contact and contract data, VIN, vehicle condition data (e.g. error messages, workshop code/service code, wear information on diagnostics-enabled components and mileage, maintenance status, service work performed)	Standard storage period in accordance with 1.6	Mercedes-Benz or smart service partners, roadside assistance companies

3. Glossary

Term	Meaning	
Processor	Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	
Equipment data	Equipment of the vehicle, e.g. availability of audio and video codecs, screen resolution, optional extras	
Authentication data	Access data for accounts with Mercedes-Benz/relevant third-party providers	
Back end	The Mercedes back end refers to the entirety of the servers and technical infrastructure that ensure that the services in the vehicle function and on which Mercedes-Benz processes and stores the data required to provide the entire range of Digital Extras.	
Battery identification	Assignment of data to battery	
Battery status	Physical values of the battery cells such as voltage, current, hysteresis, etc.	
BMS->RBMS communication	Send/receive confirmations between ECUs and cloud	
BMS	Battery Management System (in the vehicle)	
Legitimate interest	Article 6 (1) f General Data Protection Regulation: Any interest of the controller that is approved by the legal system.	
Data subject	In each case, an identified or identifiable natural person to whom personal data relate.	
CIAM ID	Technical ID for managing and controlling identification and access authorization to the user account	
Data for calculating the electric range	Vehicle settings, battery status, selected route	
Service(s)	Digital Extra(s) as defined in the Terms of Use	
Service status	Activation/deactivation of a service or Digital Extra	
Consent	Article 6 (1) a General Data Protection Regulation Voluntary, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.	
Event	An event in a Digital Extra, e.g. a navigation service or a parking process	
Trip data	E.g. average speed, fuel consumption, odometer reading	
Vehicle data	Vehicle-specific contract and technical data which describes the vehicle, such as VIN, equipment data, year of manufacture, date of order and date of delivery.	

Term	Meaning
VIN	Vehicle identification number
Geolocation data	(Current) vehicle position
IMSI	Identification number of the SIM card installed in the vehicle
Information security data	Data on information security-relevant events from vehicles (e.g. access or manipulation attempts)
Al	Artificial intelligence
Contact details	E.g. postal address, email address, telephone number (landline, mobile)
Customers	Vehicle users who register with Mercedes-Benz and accept the Terms of Use
Charging transaction data	Charging date, transaction data for individual charging processes, e.g. start and end time of the charging process, amount of energy charged, total price
Mercedes-Benz or MB	Mercedes-Benz México, S. de R.L. de C.V., Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348
Mercedes me ID data	Mercedes me ID, first and last name, email address, password / PIN, country / region
Co-users	Vehicle users who are registered by customers as co-users of the vehicle. Co-users cannot activate any Digital Extras and can only deactivate certain Digital Extras or sub-functions thereof.
Name	First name and last name, other name elements if applicable
Navigation data	Map section selected in the vehicle and selected route, destination address, data for route calculation, estimated time of arrival
Usage data	Data on the usage behavior of the vehicle users with reference to the Digital Extras
Usage profile	Profile in the vehicle of the respective vehicle user (customer or co-user)
Optional Mercedes me ID data	Optional data related to the Digital Extras, e.g. date of birth, landline number, profile picture
Personal data	Any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Profile data	Data of the usage profile selected in the vehicle, e.g. profile authentication level, preferred settings / information of the vehicle user, favorites

Term	Meaning	
RBMS	Remote Battery Management System (in the cloud)	
Security	Verification of data integrity	
Other vehicle users	Persons who drive a Mercedes-Benz vehicle in which Digital Extras are activated but are not registered/logged in as a customer or co-user	
Master data	Name, date of birth	
Us	Mercedes-Benz México, S. de R.L. de C.V., Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348	
Telemetry data	Timestamp, environmental data (position data, altitude, outside temperature), position data (e.g. steering wheel position, longitudinal acceleration, braking force), suspension data (e.g. ESP front wheel angle, damping ratio left / front right / rear left / rear right, tire temperature), drive data (e.g. engine oil temperature, turbocharger boost / pressure, engine torque)	
Controller	Natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.	
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, polling, use, disclosure by transmission, dissemination or another form of provision, comparison or combination, restriction, erasure or destruction.	
Fulfillment of contract	Article 6 (1) b General Data Protection Regulation - The processing of personal data is considered lawful if it is necessary for the fulfillment or intended conclusion of a contract.	
Wallbox data	Wallbox ID, access token for authentication of the wallbox (e.g. via app or RFID card), other device-specific wallbox data (e.g. name of the wallbox assigned by the customer, wallbox account ID, security code)	
Wearable	Mobile device that is worn on the body	
We	Mercedes-Benz México, S. de R.L. de C.V., Avenida Santa Fe 428, torre III, Piso 4, Santa Fe Cuajimalpa, Cuajimalpa de Morelos, Ciudad de México, México, C.P. 05348	
Payment data	Credit card details (cardholder, credit card number, expiration month, expiration year, security code)	

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