

## **Legal notices on data protection**

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MINI understands that use of your information requires your trust. MINI is committed to the highest standards of data privacy and will only use your information for clearly described purposes and in accordance with your data protection rights.

### **Who is responsible for data processing?**

The MINI Connected service (referred to as “the service”) is a family of applications and services. The service includes MINI App for iOS, MINI App for Android (the “apps”), MINI Connected applications running in the vehicle. MINI Canada, a division of BMW Canada Inc. (“MINI”) makes the app available to you in Canada. All data processing related to the services provided through or within the app is conducted in the United States, and may be processed in the European Union.

### **What information may be collected about you and how is it used?**

The service is designed to be a highly personalized mobility companion. In order to provide the personalized features of the service, MINI collects, stores and processes your personal data in compliance with applicable law.

The data collected for the service are processed for the following purposes:

#### **A. Contracting to use the service**

In order to use the service, the following data categories are processed:

- *account login* (-BMW Group Login)
- *contact data* (last name, first name, address, email address, etc.)

Login with BMW Group IDTo use the Service, you must register in the App. When you register, you will receive an online customer account that gives you access to other BMW Group portals and offers. In order to provide you the BMW Group login service, your data is passed on to the BMW Group company that acts as a provider of the applications in use by you. Storage of the data from your customer account is handled by BMW AG and is separate from any other (even potentially identical) data about your person that may be available to BMW Group.

#### **Delete**

Your account login used to access your MINI App service is also your login for your other MINI services. You can delete your account at any time. For details, please go to the section on “Your data privacy rights”.

#### **B. To provide the personalized features of the service**

The service collects and processes the following data to provide the user’s personalized features of the service:

##### *Service data*

- user profile (preferences, language, app ID, Top driver number, etc.)
- user feedback (service rating, comment, problem description, etc.)
- position and movement data (time, position, speed, etc.)
- destination (position, street address, destination name, etc.)
- messages (message, recipient contact information, etc.)
- vehicle profile (vehicle identification number; VIN, licence plate, etc.)
- MINI retailer or service center (preference, etc.)
- environmental information (temperature, rain, etc.)
- anonymized application analytics (click events, app launch events, etc.)

##### *Vehicle data*

- vehicle ID (links your specific vehicle to the service)

- vehicle maintenance data (next service, oil level, break wear, etc.)
- vehicle status data (mileage, battery voltage, fuel levels, door and window status, etc.)
- vehicle data (remote event, date/time, etc.)

A complete list of the features, a detailed description for each and the data used can be found at service descriptions.

### Delete

You can delete your data at any time in the app. There are several ways to delete your data:

- For some data types, you can delete the individual data elements; such as a single destination
- You can delete all application data by clicking the “clear all application data” in the privacy menu in the app. This deletes all the data generated and collected by the app but your MINI login, vehicle data and other non-application data will not be deleted.
- To exercise your right to be forgotten contact your local customer support center.

### Consent

When you launch the app for the first time, you will be prompted for your consent for a few specific data types. You will be prompted for your consent before the service begins collecting the data. If you decline, the features which require that data will be disabled.

Specific consent is requested for:

- *position* (geolocation)
- *calendar* receiving notifications
- access to your camera and/or photos

You consent to allow the service to collect and process all other described data types when you accept this privacy notice.

### Opt-out of data collection

You have the right to opt out at any time.

.. If you wish to continue using the app but opt-out of data collection for specific data types

- You can turn off location, calendar access, camera access, photos access and notification in the settings menu in the app.

.. to opt-out of any other data collection the app will no longer function

- Delete your application data using the “Delete all application data” button in the privacy menu
- Delete the app from your phone

### **C. Assurance of product quality and development of new products**

Beyond the mere provision of services, the data collected under Section B. are also processed for the purposes of quality assurance and for the development of new products and services by MINI. These processing activities serve the legitimate interests of MINI in our effort to bring you the highest quality products and services as well as new and innovative offerings.

In order to protect your privacy, the data used to improve our products and create new services is stored in a form that it is not directly traceable to you or your vehicle.

The health of the service is constantly monitored. If the monitoring detects critical system fault some data collected under Section B. may be reviewed be to help determine the cause in order to correct the problem. Access to this information is strictly limited and is only used when needed to resolve a critical issue.

#### **D. Compliance with legal obligations to which MINI is subject**

MINI will also process personal data if there is a legal obligation to do so. This may be the case if we need to contact you because your vehicle is affected by a recall or technical action.

Collected data is also processed in the course of ensuring the operation of IT systems; such as:

- Backup and recovery of data processed in IT systems
- Logging and monitoring of transactions to verify proper functioning of IT systems
- Detection and prevention of unauthorized access to personal data
- Incident and problem management for troubleshooting IT systems

Collected data is also processed in the context of internal compliance management, in which we check, whether you have been sufficiently advised in the context of a contract and that the dealer has complied with all legal obligations.

MINI is subject to a variety of other legal obligations. In order to comply with these obligations, we process your data to the extent required and, if necessary, pass these on to the responsible authorities within the framework of statutory reporting obligations.

#### **E. Data transfer to selected third parties**

The service includes features that utilize selected third parties in order to provide the function of the feature. In most cases, the data is provided in anonymized form such as the request to the map provider to retrieve the map image for your location. In other cases, the feature may require the transfer of your personal data to the third party such as when you schedule a service appointment for your vehicle. Features that send your personal data to a third party will inform you of the transmission or prompt for your consent before sending the data.

Details for all third party transmissions are described in the respective service descriptions.

#### **How do we collect your personal data?**

MINI collects your personal data in the following conditions:

- The app is actively running, either in the foreground or background, on your mobile device
- You actively use the features of the app
- If you access the service via an integrated device the service will collect anonymized usage analytics
- When you use the service to perform Connected functions such as executing a remote command (e.g. locking your doors) or viewing your vehicle status the data is generated by your vehicle. All Connected data is collected and processed under your Connected agreement and is detailed under the Connected Privacy Policy included separately in the app

#### **How do we keep your information safe?**

We secure your data using state-of-the-art technology. By way of example, the following security measures are used to protect your personal data against misuse or any other form of unauthorized processing:

- Access to personal data is restricted to only a limited number of authorized persons for specified purposes
- Data is transferred only in encrypted form
- Data is stored in encrypted form
- The IT systems used for the processing of the data are technically isolated from other systems to prevent unauthorized access, e.g. by hacking
- Access to the systems is monitored permanently in order to detect and avert misuse at an early stage

### [How long do we store your data?](#)

We only store your personal data for as long as is required for the respective purpose. If data is processed for multiple purposes, they are automatically erased, or stored in a form that is not directly traceable to you, as soon as the last specified purpose has been fulfilled.

The service retains the data for a varying period depending on the data type. The details for each data type are described in the service descriptions. Retention periods fall into the following categories:

- Data retained only until the process, request or action is completed (example: you send a message to a friend to notify them of your estimated arrival time – message is sent and then deleted)
- Data retained for a defined period (example: vehicle data is retained for 30 days, position data is retained for 1 year)
- Data retained until you delete it or if you stop using the service for more than 5 years (example: your user profile, destinations you manually entered)

### [Who will we share your data with and how will we protect it?](#)

Data, including your personal data collected within or through your use of the app is processed in the United States by BMW Group employees, and its agents, contractors and service providers, and stored in servers located in the United States. Data may also be processed in the European Union. MINI ensures that your personal data is processed in accordance with the Canadian level of data protection required by Canadian law for international data transfers including by using standard agreement language and terms, and suitable technical and organizational measures.

### [How you see and change your privacy preferences](#)

You can review and change your privacy settings at any time in the app under the settings menu. Depending on the vehicle model, you can also access a privacy menu in your vehicle in which you can also change the vehicle related settings.

### [Your data privacy rights, your right to complain and contacting MINI](#)

MINI is committed to protecting your privacy. This Privacy Policy incorporates the MINI Connected Privacy Policy, which together, govern the collection, use, and disclosure of your personal and vehicle information using the MINI App in Canada pursuant to the MINI Canada MINI App Terms and Conditions of Use. Should a conflict arise between the terms of this Privacy Policy and the MINI Connected Privacy Policy, the terms in this Privacy Policy shall govern. The MINI Connected Privacy Policy can be viewed at [www.mini-connected.ca](http://www.mini-connected.ca).

If you have any questions about our privacy practices, or would like to request a copy of our Privacy Policy, please contact our Privacy Officer.

By email: [privacy@mini.ca](mailto:privacy@mini.ca)

By phone: 1-866-DRV-MINI (1-866-378-6464)

By postal mail: MINI Canada, Privacy Officer  
50 Ultimate Drive  
Richmond Hill, Ontario L4S 0C8  
[privacy@mini.ca](mailto:privacy@mini.ca)

If you would like access to review, modify, correct or update the accuracy of any personal data you provide on activation, please contact the MINI Customer Relations Centre.

By email: [customer.service@mini.ca](mailto:customer.service@mini.ca)

By phone: 1-866-DRV-MINI (1-866-378-6464)

Calls may be recorded for quality assurance, employee training and compliance purposes.

### **Minors**

The MINI app is not designed or intended for use by children under the age of 16. We do not knowingly collect any personal data from anyone under the age of 16 without the prior, verifiable consent of a parent or guardian. Such parent or guardian may, upon request, view the information provided by the child and require that it be deleted.

In all communications to us, please indicate that you are writing concerning the MINI App application. We will do our best to respond to all reasonable inquiries in a timely manner.

Additionally, you are entitled to lodge a complaint with a supervisory authority.