

MINI CONNECTED PRIVACY POLICY

CANADA

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Legal notices on data protection

MINI is committed to your privacy. The high standard that you associate with the features of our products and services are the guideline we use in handling your information. In doing so, we seek to create and maintain an environment conducive to a trustworthy business relationship with our customers and interested parties. The confidentiality and integrity of your personally identifiable information is especially important to us.

Who is the authority responsible for data collection and processing?

This Privacy Policy governs the provision of certain vehicle-based information and assistance services and support such as MINI Digital Services, MINI Assist Services and other services (together, the "MINI Services") by MINI Canada, a division of BMW Canada Inc., our related divisions, including MINI Financial Services Canada ("MINI Canada", "we" or "us") and service providers acting on our behalf under the designation "MINI Connected". This Privacy Policy explains how we collect, use, disclose, transfer and store MINI Connected subscribers' ("you", "your") personal and vehicle information pursuant to the MINI Connected Subscriber Agreement and the Connected Terms and Conditions of Use (together, the "Connected Agreement"). This privacy policy incorporates by reference the MINI Privacy Policy located at www.mini.ca. Further information about how we use cookies and interest-based advertising can also be accessed at www.mini.ca.

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

The MINI Services are designed to be a highly personalized mobility companion. In order to provide the personalized features of the service, we collect, store and process personal information in compliance with applicable law.

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

A. Concluding the agreement

As part of concluding the Connected Agreement, the categories of information which may include personal information listed below are processed:

- Contact information (last name, first name, address, telephone number, e-mail address, emergency contact information, etc.)
- Account information (MINI Connected account, bank account, credit card, etc.).

BMW Group Login

To use the Service, you must register in the App / portal. 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.

We do not knowingly collect personally identifiable information from anyone under 16 years of age. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 16, we will delete this information from our records or, if that is not reasonable, we will take reasonable available steps to de-identify the information.

B. Fulfillment of the contractual obligation for performance of the Connected Agreement

For the purposes of fulfilling the Connected Agreement, and your use of the MINI Services, and otherwise with your consent, we along with service providers and partners acting on our behalf

render a variety of services, such as MINI Intelligent Emergency Call, information services, Advanced Real-Time Traffic information, TeleServices, etc., where available. Your MINI vehicle may also be equipped with one or more sensing or diagnostic modules capable of automatically retrieving, recording, transmitting, or storing certain vehicle information and/or service requirements. When the MINI Services are activated, we may collect and retain an electronic or other record of the following – potentially personally identifiable - information: your vehicle's position and movement information, description, and direction of travel; software version information, service information such as diagnostic trouble codes, tire pressure, fuel and odometer readings; sensor and incident information, such as information about collisions, the direction from which your car was hit, which air bags have deployed, and safety belt usage; user profile including configured news, e-mail or audio provider, etc.; environmental information including temperature, rain, etc.; dynamic traffic information including traffic jams, obstacles, signs, parking spaces, etc.; information about anyone making a Connected call from your vehicle or under your account; and the date, time and duration of the call, information and recommendations provided to you during the call, and any MINI Assist Call Centre Specialist notes written during a call. We may use your personal information to facilitate the provision of software updates. We may also record, monitor, or track your vehicle's location or other information when your vehicle is equipped to provide stolen vehicle recovery and you report your vehicle as stolen (requires identity verification and filing of a stolen vehicle report with local authorities); when MINI reasonably believes that you are in breach of the Connected Agreement, or are in breach of the vehicle lease/finance agreement with MINI Financial Services Canada, or any other agreement with MINI in which MINI is a beneficiary thereof relating to the vehicle; or where required by law or court order.

Without your provision of such information and our collection, use and disclosure of such information, we and service providers acting on our behalf are not able to provide the respective MINI Services to you.

C. Securing product quality and developing new products

In addition to performance of service, the information collected under section B is also collected, used and shared for quality assurance in products and services offered by us and service providers acting on our behalf, and for developing new products and services. This collection, use and disclosure is used to meet the high customer standard placed on existing products and services and to allow us to fulfill the future requests of our customers through analysis, and research and development of new products and services. In order to protect the privacy of our customers, personal information is processed in a manner that is anonymized and cannot be traced back to the customer/vehicle directly.

D. Fulfillment of the sales, service and administrative processes of MINI Canada and MINI authorized retailers

In order to optimize the customer experience and collaboration with MINI authorized retailers continuously, we create evaluations and reports based on information from agreements and we share these evaluations and reports with the applicable MINI authorized retailers. These evaluations are predominantly used for introducing appropriate measures such as training courses for sales personnel to improve the request and sales process. We create the aforementioned reports only in an aggregated and anonymized form; this means that the recipients of the reports are unable to draw any conclusions about you personally.

Portions of the vehicle-specific information collected under section B is used for performance of the service processes (e.g. repair, warranty, goodwill) of MINI Canada and MINI authorized retailers. This processing is within the legitimate interests of MINI to provide our customers with the best possible service process.

MINI authorized retailers, service providers and partners acting on our behalf operate as separate and distinct legal entities from MINI Canada. Each such entity has its own privacy practices and

policies. When communicating with a MINI authorized retailer a service provider or partner, we encourage you to review their privacy policy and practices to understand how they collect, use and disclose your personal information.

E. Customer support

We, and service providers acting on our behalf use your information including personally identifiable information for communication as part of concluding contracts, see above (e.g. Purchasing Digital Services) or for responding to your requests for product and service information. We contact you regarding all aspects of concluding a contract or processing a request by e-mail.

For quality assurance, employee training and compliance purposes, calls to the MINI Assist Call Centre may be monitored and/or recorded.

Given the nature of the MINI Services, there may be times when someone other than you is using the Services we provide to you. You are solely responsible for informing such person about this Privacy Policy and the privacy choices you have made.

F. Marketing communications and market research due to consent

Your information may be used and shared by MINI Canada with service providers and partners and for promotional, marketing or related purposes, contests and/or market research. You may choose to opt-out from promotional electronic and other communications at any time by contacting MINI Customer Service at 50 Ultimate Drive, Richmond Hill, ON L4S 0C8, by telephone at 1-866-DRV-MINI (1-866-378-6464), email us at customer.service@mini.ca, or by following the unsubscribe instructions found in electronic mail communications from MINI. Please also see the **“How can I correct and update my personal information?”** section below to make choices about telephone, email, text message and other communications. Please note that MINI is not able to process opt-out requests for offers and promotions from third parties including service providers and partners. You must contact the service provider or partner directly to opt-out of such communications. You will continue to receive electronic communications relating to the MINI Services and your MINI Services Account.

If you exercise choice regarding certain marketing and promotional communications, your information may still be used for the other purposes described in this Privacy Policy including marketing communications where you have not exercised your choice, or communications we are required or permitted by law to send to you, such as account related messages, recalls, etc.

Some collection and disclosure practices cannot be separated from the MINI Services offered. In such circumstances, you may be required to decline those MINI Services or accept limited functionality.

Cookies and Tracking

We may use cookies, web beacons, pixels and similar technologies to gather information about your access and use of the MINI Services to help provide our products and services, remember your preferences, maximize the performance of MINI Services, make your experience personal and convenient, and display relevant advertising.

We may also combine this information with other information collected online or offline about you, including information provided from third party sources, and it may be used or shared for the purposes described in the Privacy Policy. We may also allow third party advertising and partners to use cookies on the services in order to develop personalized content and appropriate advertising based on your use of the MINI Services and applications and non-MINI Services and applications. This information may also be used to evaluate our online advertising campaigns or to tailor promotions or other marketing messages to you.

We may also place cookies in email communications to measure the effectiveness of our electronic campaigns by identifying the individuals who open or act upon an email message, when an email message is opened, the type of software, device, operating system and browser used to deliver the email and any URL accessed through our email message.

Please refer to your web browser for instructions to learn more about cookies and other technologies and how to manage their use, and how to disable cookies. If you refuse or delete cookies, some of the functionality of a website may be impaired. You may refuse or delete cookies, and otherwise express your choices on marketing communications as set out above.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole.

We may use a “click-through URL” linked to content on the MINI Services. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page. We track this click-through data to help us determine interest in particular services and topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the MINI Services and email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers

G. Fulfillment of legal obligations of MINI

We may also collect, use and share information including personally identifiable information if there is a legal, regulatory or contractual obligation to do so. For example, we may contact you because your vehicle is subject to a recall or repair request. When required, we may release information, including location data, to comply with the law, in legal proceedings, to respond to subpoenas or court orders, in co-operation with law enforcement agencies, and/or to enforce the terms of our agreements, as well as part of legal and reporting requirements.

Collected information including personally identifiable information is processed as part of safeguarding the operation of IT systems. Safeguarding in this context includes, but is not limited to the following actions:

- backup and restoration of data processed in IT systems;
- logging and monitoring transactions to check the specific functionality of IT systems;
- detecting and defending against unauthorized access to personal information; and
- incident and problem management for resolving problems in IT systems.

Collected information is also processed as part of internal compliance management, wherein we review aspects such as whether you have received sufficient advising as part of concluding an agreement and whether MINI authorized retailers have complied with all legal requirements.

H. Data transfer to selected third parties

We may share the information we collect with third parties including our MINI Assist Call Centre, roadside assistance service providers, emergency service dispatchers and providers, concierge services providers, MINI authorized retailers, members of MINI Canada and MINI divisions, as well as other service providers required to deliver the MINI Services and enforce contractual or other legal obligations as necessary.

We may also use the information we collect for analysis and research purposes and will share information as necessary with third parties to accomplish those tasks. All service providers, partners or third parties are contractually obligated to keep your information secure and confidential and use

the information only as we specify. We may also disclose information to individuals designated by you to be contacted in an emergency.

We may sell or purchase assets. If another entity acquires us or all or a portion of our assets, data including personally identifiable information that we collected from you may be shared with that entity. The data will be shared for the purpose of that entity considering whether to enter into the transaction and also to complete the transaction.

Our concierge service provider may use other service providers to provide the products and services that you request when you use the concierge services. Personally identifiable information necessary to provide any products and services you request may be given to such third-party service providers and the MINI Connected Privacy Policy and Terms and Conditions of Use will not govern those providers. We recommend that you carefully review the user terms and privacy policies of each third party service or application prior to registering, signing up, downloading or using them.

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

We will retain your information including personally identifiable information for as long as necessary to fulfill the purpose of providing our products and services, to operate our business, to comply with applicable laws, to enable us to communicate with you, for record-keeping, for our safety, research, evaluation of use, troubleshooting purposes, or to meet legal and contractual obligations. Where necessary, we anonymize or delete information we collect when we no longer need it for the uses described in this Privacy Policy.

[How is your data stored?](#)

We may process and store information including personally identifiable information in electronic format on servers located outside of Canada and maintained by various MINI divisions. We may use service providers who process or store information outside of Canada. We provide appropriate protections for cross-border transfers as required by law for international data transfers. With respect to such transfers, we implement standard contractual clauses and other mechanisms to protect such information. In certain circumstances your information may be accessible by law enforcement, government, regulatory bodies or other authorities in accordance with the laws of the foreign jurisdictions. You may contact us, as set out below, to obtain information about our policies and practices with respect to service providers outside of Canada.

[To whom is the data passed and how do we protect it along the way?](#)

Information including personally identifiable information may be processed by MINI employees, agents and contractors, MINI authorized retailers and by service providers and partners acting on our behalf, with preference given to those within Canada. Information may be shared with our service providers, partners, third parties, MINI authorized retailers, members of MINI Canada and other divisions that assist with delivery of the Connected Services. We may also disclose information to individuals designated by you to be contacted in an emergency.

We are committed to protecting the personally identifiable information in our possession. We use administrative and technical controls, and require our service providers to take such measures, to help to maintain the security of your personally identifiable information. We have implemented security measures which include but are not limited to the use of: internal security policies and procedures; defined internal segregation of duties; and electronic access controls such as passwords and encryption technology. However, no system of protection can guarantee the protection of your information.

We encourage you to observe safe computing practices. It is your responsibility to keep confidential any user-IDs and passwords that you use to register with us and not share them with anyone. In providing the MINI Services, voice and data are transmitted between the MINI Assist Call Centre and your vehicle over the cellular telephone network. This network is complex and not necessarily secure. Therefore, the privacy and security of conversations or data transmitted to and from the vehicle cannot be guaranteed.

[How can you view and modify your data privacy settings?](#)

We strive to keep the personal information in our possession or control accurate, complete, current and up-to-date as is necessary for the specified purpose, based on the most recent information available to us.

You can view, modify, correct or update the accuracy of any personal information we collect at any time on the MINI Connected portal at www.mini-connected.ca. If you are unable to locate the information you require access to, you may contact us at 1-866-DRV-MINI (1-866-378-6464); or send an email message to privacy@mini.ca. You may be requested to provide satisfactory identification and proof of entitlement to access your personal information. We will provide you with access to your personal information that is in our possession, subject to certain exceptions. For example, we may not provide you with your personal information where the information is subject to solicitor-client privilege or consists of references to other persons or proprietary information that cannot be severed from the record. There may be reasonable costs associated with your request.

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 at privacy@mini.ca; by telephone at 1-866-DRV-MINI (1-866-378-6464); or by mail MINI Canada at 50 Ultimate Drive, Richmond Hill, ON L4S 0C8. You may request access to or a copy of your personal information by writing to us at 50 Ultimate Drive, Richmond Hill, ON L4S 0C8.

We welcome your comments and emails. Please note that any information, including but not limited to suggestions, ideas or submissions you make through and onto any MINI Canada website will become the exclusive property of MINI Canada Inc.

Our Privacy Policy may change from time to time. When we change the policy in a material way, a notice will be posted on the Connected portal along with the updated Privacy Policy. Please check back frequently for updates.

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