

VEHICLE APP PRIVACY STATEMENT

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The entity responsible for the processing of personal data referred to below is Jetour Motor Rus LLC (hereinafter referred to as “we” or “us”), a private company with limited liability established under the law of Russia, having its statutory seat in 115054, MOSCOW, KOSMODAMIANSKAYA EMBANKMENT, 52 Bldg. 1. To ensure compliance Russia data protection legislation, Jetour Motor Rus LLC is the data controller of this personal data.

If you have any questions regarding the processing of your personal data, please note that the Company has a Data Protection Officer who can be contacted at the following email address: privilege@jetour-motor.ru.

We give top priority to the protection of your personal data, and we process your data in accordance with applicable data protection laws. This statement provides comprehensive information about the processing of personal data when you use our application to stay connected to your vehicle.

Please note, data processing depends on your vehicle’s specific features and the services you opt to activate, thus this Policy encompasses the broadest scope of potential processing. It’s important to note, data processing related to a specific feature won’t occur if you own an older vehicle model or a new model that does not include that feature.

This Privacy Statement does not apply to:

1. The processing of personal data when you use our vehicle;
2. The processing of personal data that does not leave the car (local processing);
3. The processing of personal data when you interact with distributors, dealers, or retailers (such as when you purchase your car or have it repaired);
4. Your use of software and third-party apps/services within the car (such as apps within the car’s infotainment system). The data processing of these apps is subject to their individual privacy policies, which we strongly advise you to read carefully;
5. Your utilisation of third-party value-added services based on car data (such as driving behaviour-based insurance); or
6. The provision of the internet service in your car, supplied independently by a mobile network operator distinct from us.

In this Privacy Statement, we will explain to you:

1. What personal data we collect and how do we use it?
2. What third-party services do we use?
3. Who will we share this data with?
4. How do we transfer your data outside Russia?
5. What rights do you have in relation to your personal data?
6. How long do we retain your data?
7. How do we protect your data?
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1. What personal data we collect and how do we use it?

Our application has several functionalities, which entail different types of personal data processing, as we will explain below. ***Wherever you are not asked specifically whether you agree to any data processing, the reason why we process this data is in order to perform our contract with you.***

1.1 User Registration and Login

To fully utilise the services provided by our application, you must register for a User ID. Upon successful registration, you will receive an online account, allowing you to log in our vehicle account as well. Should you forget your account password, our password retrieval service is available to assist you. To create and access your account, we need to process your mobile phone number, User ID login information, message verification code, password, your nickname and profile photo. If you sign up through a third-party service, like Apple, we'll collect the information from them that you authorize.

The legal basis for the processing of the data mentioned above is your consent. Without providing the necessary information, you will be unable to obtain a User ID, login, or enjoy the services offered by our application.

1.2 Vehicle Ownership Verification and Management

Should you purchase a vehicle, it is necessary for us to verify your ownership in order to provide you with connected car control features. We are required to collect your Vehicle Identification Number (VIN), engine number, vehicle nickname(optional), and license plate number (optional) to assist in the completion of your vehicle ownership verification.

You can also manage changes to your vehicle, including the replacement or unbinding of the vehicle. If you apply to replace or unbind a vehicle, for the security of your vehicle, we will need to collect your Vehicle Identification Number (VIN), engine number, license plate number(optional), vehicle nickname(optional), text message verification code (for deactivated vehicles), and PIN code (for activated vehicles) for verification purposes. Should you refuse to supply information, we will be unable to confirm your identity, thus preventing us from validating your ownership and ensuring consistency in the vehicle-owner relationship.

When the vehicle that you intend to bind is already linked to another account, you can click 'unbind with the original owner' to forcibly unbind the vehicle from its previous association. In order to verify your identity, we require that you provide your government-issued ID or your driver's license, and your Vehicle Registration Certificate, to aid in the confirmation of your vehicle ownership.

The legal basis for the processing of the data mentioned above is in order to perform our contract with you.

1.3 Account Management

Once you have been successfully verified as the owner, you will have the capability to add authorised user accounts. When adding an authorised account, you must provide us with the mobile number of the authorised account in order to activate it. Please ensure that you have informed the authorised individual about the relevant circumstances and obtained their consent. For ease of managing your vehicle and to safeguard the security of both your vehicle and account,

you must establish a car control password, which will be used for authentication when initiating remote vehicle control functions.

Please note, for the security of the vehicle, if any authorised accounts access to the vehicle that the owner has bound, the GPS information of the vehicle during the driving of these authorised accounts will be synchronised and shared with the vehicle owner's account.

The legal basis for the processing of the data mentioned above is in order to perform our contract with you.

1.4 Feedbacks

When you communicate with our customer service team, depending on your different needs, you may be required to provide various pieces of information, including the issue you are reporting, your communication records with customer service staff, and related content. To respond to your feedback, we will record your user ID, mobile phone number, and Vehicle Identification Number (VIN).

The legal basis for the processing of the data mentioned above is your consent.

1.5 Dealer Inquiry

When you use our nearby dealer Inquiry service, we need to collect your location information so that we can show you the distribution of dealers in the corresponding area. and we will further provide you with the dealer's location, name, phone number or other contact information for your convenience.

The legal basis for the processing of the data mentioned above is your consent.

1.6 Book a Test Drive

When you use the book a test drive feature, we need to collect your name, email address, mobile phone number, and your mobile phone's location information in order to search for the distance between you and the booked store and to arrange the test drive service for you.

The legal basis for the processing of the data mentioned above is your consent.

1.7 Appointment for Maintenance

When you opt to use our maintenance services, we collect information including the user ID, the type of service required, the name of the dealership, the scheduled time for service, the name of the individual delivering the vehicle, the contact number and Vehicle Identification Number (VIN). You may also choose to provide the name of the after-sales advisor and specify the method of vehicle collection and delivery. During the maintenance service, either we or our appointed service provider may access and use data relevant to your vehicle's specific functions or services, inspect the vehicle, and record any faults, as well as the maintenance performed.

The legal basis for the processing of the data mentioned above is in order to perform our contract with you.

1.8Community and Events

When you use the community's comment, content sharing, service review, favourite, and follow features, we will record your user ID, nickname, avatar, followings, comments, fan status, and the records of content you post, favourite, and interact with, as well as your usage of the community forum. Please be mindful that the content you share may contain your personal information; consider this carefully before sharing.

When you sign up for online or offline events organized by us or in collaboration with third-party platforms, we will collect your name and mobile phone number, depending on the event's nature.

The legal basis for the processing of the data mentioned above is your consent.

1.9 Application Functioning

To ensure the smooth use of our products and/or services, maintain their proper functioning, protect the security of your account, enhance operational quality and efficiency, we will collect information about your vehicle, device, service logs, operating logs, performance status, and device details including model, operating system, unique device identifiers (such as IMEI/Android ID/OAID/IMSI/IDFA/BSSID/SSID), software version numbers, MAC addresses, IP addresses, network performance data, and device location information while you use our products and/or services. ***The legal basis for processing the aforementioned data lies in our legitimate interests, which include*** identity verification, account security assessments, security precautions and checks, as well as to prevent or prohibit illegal activities.

1.10 APP Permissions

When utilising our app, we may require access to certain permissions on your device to gather pertinent personal data and furnish you with corresponding business capabilities or services. In the event that permission is not conferred, we will be unable to deliver the relevant business features or services. Should the permission be activated, you have the ability to navigate to "Phone - System Settings" on your mobile device at any moment to deactivate the pertinent permissions. Should the permissions be deactivated, it is possible that the associated service functionalities may not operate optimally.

1.10.1 Location Permission

We will seek your permission under any of the following circumstances:

- When you book a test drive.
- When you use the dealer inquiry feature.

1.10.2 Camera Permission

We will seek your permission under any of the following circumstances:

- When you change the profile photo of the user account within the app.
- When you upload government ID or other documents for compulsory unbinding.
- Scanning the vehicle unit's QR code to log into the vehicle account.
- When you post pictures on our forum or send pictures to customer service.

1.10.3 Storage Permission

- We require access to read and write to the external storage of your device to save or load files. For example, we encrypt and store your map search history, login status, and other information on your device.

1.10.4 Internet Permission

- We require internet access to communicate with local servers, such as loading content or sending requests.

1.10.5 Photo Permission

We will seek your permission under any of the following circumstances:

- When you take photographs or select album photos to change the profile picture of the user account interface within the application.
- When you upload government ID or other documents for compulsory unbinding.

2. What third-party services do we use?

In order to provide you with better service, we may entrust a cooperative third party to process your personal data. The table below provides information on the third parties we might engage for the processing of your personal data, if any:

Third-Party Service	Purpose and Use	Link to Third-Party's Privacy Policy
Yandex Map	Provide map and navigation service	https://yandex.ru/legal/confidential

3. Who will we share this data with?

In general, we do not share your personal data with anyone for any purpose, except for the following circumstances:

3.1 Affiliates and subsidiaries

To assist, operate, enhance, and fulfil services on our behalf based on our legitimate interests to outsource certain operations, we share personal data with our affiliates and subsidiaries.

3.2 Services providers and business partners as data processors:

We share data with our service providers and partners to maintain our business operations, our relationship with you, and provide you with our services:

Categories of providers	Reason for Sharing
IT-providers and their sub-processors	Personal data is transferred to IT-providers who supply general business support systems to us, such as software and data storage providers.
Cloud service providers	To enhance vehicle function and provide cloud service.

3.3 Law enforcement and government authorities

To fulfil our legal obligations, we may be required to disclose information in response to subpoenas, court orders, or lawful requests from government authorities conducting investigations. This includes compliance with law enforcement requirements, regulatory inquiries, and the verification or enforcement of our policies and procedures. We may also disclose information in emergency situations to prevent or halt potentially illegal, unethical, or legally actionable activities. When we receive a request for personal data from a law enforcement authority, we assess the necessity and proportionality of the requested information.

4. How do we transfer your data outside Russia?

In principle, the personal data we collect is stored within the countries of your place of residence, within Russia. In some cases, your personal data may be processed outside your country of residence. Regardless of where your personal data is processed, we apply the same protections as described in this Statement. We transfer your personal data in accordance with the legal frameworks required by different jurisdictions. Recipients of your personal data are required to adhere to the same level of privacy safeguards as mandated by applicable data protection laws.

5. What rights do you have in relation to your personal data?

You possess legal rights in relation to the personal data that we process about you. These rights may vary based on the jurisdiction in which you're situated, and the specific nature of the data processing involved. Broadly speaking, your rights pertain to the ability to:

- Right to access your personal data;
- Right to request the cessation of processing your personal data for the purposes of promoting goods, works, and market services;
- Right to object to decisions made solely based on the automated processing of your personal data.

You may request to cancel your account through the 'Cancel Account' interface in the APP, or get in touch with us using the contact information provided in Section 9 of this Privacy Policy. After verifying your identity, we will assist you with the matters related to account cancellation.

If you choose to cancel your account, we will delete or anonymise your personal data in accordance with legal and regulatory requirements, except where otherwise stipulated by laws and regulations. After your account is cancelled, we will not be able to continue providing you with account registration services and products or services that require account login. For the safety of your vehicle, once the cancellation is successful, the account in your vehicle will automatically log out.

If your account is an authorised account, you can proceed through the 'Unbind from the original owner' interface in the APP to unbind it yourself. Please note that after you cancel your account, any authorisation relationships associated with your account will be automatically unbound.

You also have the right to lodge a complaint with your local data protection supervisory authority or with any other data protection authority in Russia. However, we would appreciate it if you first contact us to try to solve your issue – you can find our contact details in Section 9.

6. How long do we retain your data?

We retain data related to our provided services in accordance with legal obligations. If you are a customer, we will keep your data for the duration of any contractual relationship you have with

us, and, where permitted, beyond the end of that relationship for as long as necessary to fulfil the purposes set out in this Privacy Statement.

We retain the data we collect from or about you for the period necessary to fulfil the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law. Once the data is no longer necessary for these purposes, we either delete it or retain it in an anonymised form. In determining the appropriate retention period, we take into account various criteria, including the type of services requested by or provided to you, the nature of our relationship with you, the potential impact on the services we provide to you if we delete certain data about you, and the retention periods mandated by law.

7. How do we protect your data?

We strive to maintain high security standards and have implemented robust technical and organisational measures to protect your data, in accordance with the current, general state of technology. We ensure that your personal data is adequately secured against loss, falsification or unauthorised access. However, please note that the transmission of information via the internet is not completely secure. While we do our best to protect your personal data, we cannot guarantee 100% security of your data transmitted to us.

Once we have received your personal data, we use strict procedures and security features to prevent unauthorised access. In the unfortunate event of a personal data incident, we will report it and take remedial measures in accordance with the requirements of the law and regulatory authorities.

8. How do we protect the personal data of minors?

We attach great importance to the protection of minors' personal data. We will provide services and protection for minors in strict accordance with national laws/regulations. Parents or other guardians should also take appropriate measures to protect minors, including monitoring their use of products or services.

We treat anyone under the age of 18 (or the age stipulated by local laws) as a child. We do not knowingly collect or use any Personal Data from children without prior, verifiable consent which is given or authorized by the holder of parental responsibility over the child. We do not knowingly allow children to order our vehicles, communicate with us, or use any of our online services.

If you become aware that a child has provided us with Personal Data, please contact us according to section 9. We will take all reasonable measures to access, correct, or delete the personal data of the person under guardianship at any time.

9. How can you contact us and make a request?

If you have any questions about the processing of your personal data, we recommend reading through this Privacy Statement first.

To make a query, raise a concern, or exercise your data subject rights, please feel free to contact us at privilege@jetour-motor.ru. We take your privacy seriously and aim to respond to you within one month or within the timeline specified by the relevant local privacy protection law, after confirming your identity.

If you believe that we have not adequately addressed your complaints or concerns, you have the right to lodge a complaint with a competent data protection authority.

10. How will we update this Privacy Statement?

We may update this Privacy Statement, for example, to reflect changes in our business operations and measures for protecting personal information. If we make changes to this Privacy Statement, we will notify you. Where changes to this Privacy Statement significantly impact the nature of our data processing or have a substantial effect on you, we will provide sufficient advance notice, allowing you the opportunity to exercise any applicable rights.