



Privacy Notice

ex articles 13 and 14 of EU Regulation 2016/679

Dear User,

Pursuant to Article 13 of European Regulation 2016/679 (GDPR), we provide you with the following information regarding the processing of personal data that you may provide to Hyundai Motor Company Italy S.r.l.

1. Data Controller

The data controller of your personal data is Hyundai Motor Company Italy S.r.l., with registered office in Milan – 20152, Via Giovanni Bensi 11 (hereinafter also referred to as the "Company"). For all processing of your personal data, as regulated in this privacy notice, you can contact us via our call center at 800 617 060.

2. Data Protection Officer

The Company has appointed a Data Protection Officer pursuant to Article 37 of European Regulation 679/2016 (GDPR), who can be contacted at dpo@hyundai.it

3. Joint Data Controllers

For the purposes set out in points 6 and 7 of this privacy notice, where applicable, your data may also be processed by the local authorized Genesis dealer or repairer, who will act as joint data controller for the purposes of collecting and sharing the data and information. consent, while acting as an independent data controller for any subsequent marketing and profiling initiatives that the retailer intends to undertake based on any consent you may have provided. You may find the data of the joint controller Genesis dealer in the contractual or pre-contractual documents provided and/or made available to you by the dealer and/or request them from the Company through one of the contact points indicated in this policy.

The Company and the joint controller dealer have signed a Joint Controllership Agreement, pursuant to Article 26 of European Regulation 679/2016 (GDPR), by which they have undertaken to jointly determine the methods of processing your personal data, specifically with regard to data collection and consent, and the procedures for providing you with a timely response to requests to exercise your rights under national and European data protection legislation.

Specifically, you may exercise your rights, including the withdrawal of consent, at any time against both joint controllers through one of the contact details provided in Article 11 of this privacy notice, or by contacting the authorized dealer directly.

The essential content of the Joint Controllership Agreement can be made available to you at any time by contacting each Joint Controller.

4. Type of data processed

When booking a test drive, the Company or its authorized third parties may collect your personal data, including your name, surname, email address, telephone number, and the model of the vehicle you are interested in. This data may be processed manually and/or with the support of computerized or electronic means—where applicable—for one or more of the following purposes.

5. Purpose of booking and service provision

The data may be processed for operational management purposes related to the booking and provision of the test drive you requested, as well as for activities related to the provision of the test drive. The legal basis for



processing for this purpose is the performance of a contract or pre-contractual measures requested by the data subject pursuant to Art. 6, paragraph 1, letter b) of European Regulation 2016/679, or the fulfillment of legal obligations to which the company is subject pursuant to Art. 6, paragraph 1, letter c) of European Regulation 2016/679. Providing your data is necessary for booking and provision of the test drive, so failure to provide it will make it impossible for us to provide the service you requested.

5.1. Monitoring purposes to improve the goods and services offered

For the purpose of continuously improving company performance, your data may also be processed to assess your satisfaction with your experience with Genesis, as well as to monitor and evaluate the quality of services offered by the Company and/or its authorized dealers or repairers. The legal basis for processing for these purposes is the legitimate interest of the data controller pursuant to Art. 6, paragraph 1, letter f) of European Regulation 679/2016.

6. Marketing purposes

With your consent, the Company and authorized dealers or repairers may process your personal data to send you commercial, promotional, and advertising communications relating to events, products, or services related to Genesis. To this end, you may decide whether to receive commercial, promotional, and advertising communications from us and authorized dealers and repairers via email, telephone, postal services, or messaging (SMS, messaging services, or online chat), or through all of the aforementioned channels.

The legal basis for processing for these purposes is your consent. This consent is optional, and failure to provide it will not prevent us from providing the service you requested, but will only prevent the Company, authorized Genesis dealers, and repairers from sending you informational/advertising materials and/or communications deemed of interest. Where you provide consent, you may withdraw it at any time, without affecting the lawfulness of the processing carried out up to that point. Specifically, if you no longer wish to receive marketing communications from us, you may change your preferences or withdraw your consent at any time free of charge, effective for the future, by clicking the "unsubscribe" link included in each communication or by sending an email to dpo@hyundai.it.

7. Profiling and personalized marketing purposes

With your prior consent, your personal data may be used and analyzed by the Company, dealers, or authorized repairers to identify your consumption habits and propensities and generate profiles that allow us to proactively identify your interests and needs. This may also be done by correlating them with other data acquired (for example) from your interactions with the Genesis website and/or social media pages. To create your customer profile, we may collect and process data such as contact information and identification data, your customer history, information relating to the use of our apps, website, social media, and the use of your vehicle. You can find further information on the analysis and profiling methods used in the following section "Data analysis and segmentation to optimize and personalize our marketing activities."

The purpose of analysis and profiling is to send you offers and communications related to Genesis that best meet your interests and to better target the company's promotional and marketing activities based on the profile generated. We inform you that the Company may also share your customer profile with authorized Genesis dealers and repairers, who may use it for the same profiling purposes and to send personalized communications regarding their events, products, or services.

The legal basis for processing for these purposes is your consent. This consent is optional, and failure to provide it will not prevent us from providing the service you requested, but only prevent the Company from carrying out the profiling activities described in the previous paragraph and sharing your customer profile with authorized Genesis dealers and repairers for the same purposes. In any case, where you give your consent, you may withdraw it at any time, without affecting the lawfulness of the processing carried out up to that point. Specifically, if you no longer wish to receive personalized marketing communications from us, you can change your preferences or withdraw your consent at any time free of charge, effective for the future, by using the "unsubscribe" link included in each communication or by sending an email to dpo@hyundai.it



7.1. Data analysis and segmentation to optimize and personalize our marketing activities

As mentioned, to optimize our profiling and personalized communications, we may use data analysis and segmentation procedures and systems. Below, we provide you with information regarding the logic we use, the significance, and the consequences of this processing.

We will create a unified customer profile for you as the basis for personalized marketing activities, particularly to measure and understand the effectiveness of advertising and communications, as well as to provide you with highly relevant communications about Genesis products and services. To create this type of customer profile, we will compare your preferences and interests with your usage patterns of our products and services, such as vehicle inspection history, interactions with dealers and authorized repairers, interactions with online activities and CRM campaigns, your online behavior, and your use of our website, app, and vehicle.

Once your data has been consolidated and we have created a comprehensive customer profile, we will use this data to perform predictive analytics using scientifically recognized mathematical and statistical procedures. Predictive scoring is the use of data, algorithms, and machine learning techniques to assign scores to various segments based on available data. Once your customer profile is linked to specific customer segments, we will be able to control and adjust the type, content, and frequency of our marketing activities to ensure you receive highly relevant communications. Our predictive analytics are limited to creating target customer groups for our marketing activities. This may result in you receiving or not receiving certain communications unlike other customers.

8. Recipients of personal data

The data collected for the purposes of booking and providing the Service (Article 5) and/or to monitor the level of satisfaction and quality of the services offered (Article 5.1) may be disclosed to authorized Genesis dealers and repairers and to other companies that perform functions strictly related and instrumental to the operation of the service, as well as to affiliated and/or affiliated companies.

companies belonging to the Hyundai Group in Italy and abroad. To comply with legal obligations, your data may also be disclosed to competent authorities and public bodies.

The data collected for marketing and profiling purposes referred to in points 6 and 7 above will be shared with the joint data controller indicated in point 3 of the privacy policy and may be disclosed to affiliated companies and/or companies belonging to the Hyundai Group involved in marketing/profiling activities, as well as to suppliers – specifically identified as external data processors – appointed by the Company to carry out activities related and instrumental to marketing and profiling activities, including, for example, companies that offer email sending services for marketing purposes; companies that offer support in conducting market research; or companies that offer profiling tools.

If the service you requested is related to a financing request, where applicable, your personal data may be disclosed by our Company or the authorized dealer to HYUNDAI CAPITAL BANK EUROPE GMBH, located at Via San Marco 21, Milan, for purposes related to the verification and possible provision of financial services underlying the service. For more information regarding Hyundai Capital's processing of personal data, please consult the Privacy Policy in the "Privacy and Cookies" section of the website <https://www.hyundaicapitalitaly.com>.

9. Transfer of data abroad

For the purposes set out in points 5, 5.1., 6, and 7 above, your personal data may be transferred to the parent company Hyundai Motor Company, based in Seoul, South Korea. We therefore inform you that South Korea benefits from an adequacy decision on privacy legislation issued by the European Commission, guaranteeing the same standard of protection for data subjects as European countries.

10. Personal data retention period



With reference to the purposes set out in points 5 and 5.1., your personal data will be retained only for the time necessary to fulfill each purpose and, in any case—except for data whose retention is required by law—for a period not exceeding 12 months from the date of collection.

With reference to the purposes set out in points 6 and 7, pursuant to the Italian Data Protection Authority's provision no. 181 of October 15, 2020, your data will be retained until you withdraw any consent you may have given and in any case for a period not exceeding 24 months from the date of its acquisition.

11. Rights of data subjects

In relation to the processing described in this Policy, as a data subject, you may exercise the rights set forth in Articles 15 to 22 of European Regulation 2016/679 and, in particular, the following rights:

- Right of access – the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to your personal data;
- Right to rectification – the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data;
- Right to erasure (right to be forgotten) – the right to obtain, without undue delay, the erasure of personal data concerning you. The right to erasure does not apply to the extent that processing is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest, or for the establishment, exercise, or defense of legal claims;
- Right to restriction of processing – the right to obtain restriction of processing;
- Right to data portability – the right to receive your personal data in a structured, commonly used, and machine-readable format and to provide that data to another controller;
- Right to object – the right to object to the processing of your personal data on grounds relating to your particular situation, including, in any case, to the use of your data for marketing purposes;
- Right not to be subject to automated decision-making – the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- Right to file a complaint with the Italian Data Protection Authority: <http://www.garanteprivacy.it>;
- Right to withdraw your consent at any time and with the same ease with which it was provided, without affecting the lawfulness of processing based on consent before its withdrawal.

You can easily exercise one or all of the above rights by contacting our call center at 800 617 060, by sending an email to dpo@hyundai.it, or by contacting the dealer and/or joint data controller/repairer at the contact details indicated in the pre-contractual or contractual documents provided by the dealer.