

## PRIVACY POLICY

At Kia India Private Limited (“KIN” or “we” or “us” or “our”) (formerly known as Kia Motors India Private Limited), we respect and recognise the importance of “your” (user of UVO and its services) privacy and security and appreciate that your personal Information is very important. In order to provide “you” (user of UVO and its services) with a personalized experience of the mobile application “UVO” (including its website) that delivers the Information, resources and services that are most relevant and helpful to you, we may collect Information during your use of UVO. This policy is a demonstration of our commitment towards your privacy.

This Privacy Policy explains what Information of yours is collected and sets out key Information regarding our collection, use, process, disclosure and storage of your personal Information, how and when we might use your Information, how we protect your Information, and of your ability to access and correct it. Please review the Privacy Policy carefully so that you understand our privacy practices.

### **1. What Information does KIN gather/track and hold about you?**

KIN collects from or about you, your personally identifiable Information, vehicle Information, demographic Information or behavioural/usage Information as detailed below (hereinafter collectively “Information”) and retains the Information basis the circumstances in which the Information is collected:

1. We may collect Information about your contact details (including your name, address, email address, phone, mobile numbers and social media handles) and demographic Information about your age, gender and occupation.
2. We may require other Information from you, such as a copy of your driver's license if you participate in a test drive or your financial Information if you are seeking or obtain finance for the purchase of a KIN vehicle.
3. We may collect Information about your KIN vehicle, including its number plate and vehicle identification number (VIN).
4. We may also collect answers you provide to questions we ask and other Information relating to your dealings with KIN or KIN dealers.
5. We may also collect Information (some of which may be personal Information about you), including:
  - (i) the number of trips and distances that you have driven;
  - (ii) the location of your vehicle, including historical locations;
  - (iii) vehicle diagnostic Information, such as tyre pressure, amount of fuel in the tank and engine Information;
  - (iv) vehicle driving Information, such as speed, braking and acceleration Information; and
  - (v) mobile phone Information such as number, model, operating system and personal location data where you have activated location services on your mobile device.

6. If you request or receive roadside assistance services, we may collect Information about where (e.g., location) and when (date and time) you requested the roadside assistance services and the assistance service required.
7. Upon your visit to/usage of UVO, we may record your server IP address, domain name, the date and time of your visit and the pages viewed etc. This Information may be collected using cookies. User preferences are stored in cookies, which tracks user trends and patterns of use, and allows UVO to interact more efficiently with you.  
KIN also records the basic Information about your visits to UVO usage, for systems administration, statistical and troubleshooting purposes. We use your IP address to help diagnose problem with our server and to administer UVO.
8. In addition to the types of Information identified above, KIN may collect personal Information as otherwise permitted or required by applicable law.

## **2. What does KIN do with the Information?**

The purposes for which we collect, hold, use and disclose your Information will depend on the circumstances for which we collect it. In general, we may use and disclose your Information for the purposes for which we collect it and related purposes which you would reasonably expect and as otherwise authorised or required by applicable law. Specific purposes, for which we may collect, hold, use and disclose personal Information include:

1. to send you Information or contact you when necessary;
2. Information for reasons related to our business operations, such as to ensure we deliver quality products and services to our customers and potential customers;
3. to send you offers or invite you to events which we think could be of interest to you;
4. we may contact you in your vehicle, through email, or by telephone at the contact number provided by you, and in some circumstances, by pre-recorded message, even if doing so may result in additional telecommunication fees or charges to you, to discuss your account, offer unsolicited promotions, or to deliver services;
5. to provide you and our authorized KIN dealers with necessary support;
6. to attend to or assist in the servicing or repair of your KIN vehicle, including the provision of roadside assistance services ;
7. for product development, market research, and other marketing and promotional activities;
8. to carry out our legal compliance obligations, such as to conduct a product safety recall where necessary;
9. to provide you with notifications and Information about your KIN Vehicle;
10. to inform you of a field service action affecting your KIN Vehicle;
11. to send you service reminders;
12. to contact you directly or through our service providers and research agencies, to obtain your feedback and find out your level of satisfaction with our products, services and our authorized KIN dealers.
13. To provide the service and for quality assurance and training purposes, the authorised third party service providers may monitor and record conversations between their respective service centers and you and your vehicle's occupants or others. You, on behalf of yourself, all occupants of your vehicle, and anyone engaged in a conversation with an

authorised third party service provider about your vehicle or your UVO account, consent to monitoring, recording and sharing of call recordings of all conversations between the authorised third party service providers and you or others, and you release KIN and its Service Providers from and against any and all claims, liabilities, losses etc. arising out of such monitoring, recording or sharing/disclosure of conversations.

### **3. Consequences if you don't provide your Information?**

If we are unable to collect the Information we require, we may not be able to provide the services (some of which may be provided by authorised third party service providers) that you are looking for through UVO.

### **4. With whom does KIN share the Information?**

KIN does not sell or rent your Information to any third parties. Generally, KIN as it deems appropriate, may disclose/share (and you authorize us to disclose) your Information to third parties viz., affiliates, auditors, authorized dealers, third party, legal advisers and marketing partners etc. contracted to provide services on our behalf in connection with the services delivered under UVO. These may include:

1. KIN and our authorized dealers Information;
2. our employees, officers, contractors, service providers and agents (such as marketing agencies, market research providers, roadside assistance service providers, insurance providers, financiers, website and data hosting providers and other IT suppliers);
3. our related and affiliated companies;
4. Our authorized dealers and technology service providers in connection with the operation of the services under UVO;
5. insurance providers in order for them to provide tailored insurance policies to you;
6. Third parties that require the Information for law enforcement or to prevent a serious threat to public safety; and as otherwise permitted or required by applicable law;
7. Statutory authorities including but not limited to law enforcement agency or other government officials as reasonably necessary to respond/comply with the statutory mandate including but not limited to court orders or other legal process.

### **5. How KIN protects your Information?**

Your account Information is password-protected and KIN has taken adequate security measures to secure access to your personal data. We also have physical, electronic, and procedural safeguards that comply with the laws prevalent in India to protect personal Information about you, and accordingly, we take appropriate security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal Information stored on UVO to ensure the protection and preservation of your privacy.

The privacy and protection of your Information is vitally important to us. All Information accumulated will be acquired, processed, and used according to the applicable regulations governing the protection of Information for the sole purpose of delivering services under UVO and managing and maintaining KIN's own legitimate business interests. Any user statistics that we may provide to prospective advertisers or partners regarding your UVO usage are provided in the aggregate only and do not include any personally identifiable

Information about any individual user. Despite our efforts to protect your personally identifiable Information through security procedures commensurate with industry standards, we cannot ensure or warrant the security of any Information you transmit to us. You transmit all such Information at your own risk. We exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your Information.

## **6. Third party websites**

UVO may contain links to applications/websites owned or operated by KIN and/or third parties, including owned or operated by third party service providers affiliated with KIN. We take no responsibility for the privacy practices or content of other applications/websites, which are not under the control of KIN. Other applications/websites may contain their own privacy policies and their owners or operators are responsible for informing you about their security and privacy practices. We recommend that you thoroughly read the privacy policies of these third party applications/websites.

If you post Information in UVO or to our social media channels, you acknowledge that such Information may be publicly available. We recommend that you use your discretion in deciding what Information you upload to such websites.

## **7. Changes to the Privacy Policy**

KIN reserves the right at any time at our discretion and without notice to change this Privacy Policy simply by posting such change on UVO. Continued usage of UVO following changes to these terms will mean that you accept these changes. Please check our Privacy Policy regularly for updates.

## **8. Access & Correction**

You have the choice to opt-in/opt-out of sending an embedded telecommunication or collecting and sending your Information including vehicle's diagnostic, location and trip log Information or not to use UVO.

You may seek access to your Information and we will provide you with access as provided under UVO. We may require that you provide suitable identification for security purposes before allowing you to access your Information. Access to your Information may be refused in certain circumstances, such as where the Information relates to anticipated legal proceedings or the request for access is frivolous or vexatious. We rely on accuracy of Information as provided to us both directly (from you) and indirectly. Therefore, it is very important that the Information we hold about you is accurate, complete and up to date. If you become aware that any Information which we hold about you is incorrect, incomplete, misleading, irrelevant or not up to date, please contact us at 1800 108 5000 to correct or update your Information.

## **9. Retention of Information**

Unless specified otherwise in this Privacy Policy, we will retain your Information as permitted or required by applicable law. In some cases, even after cancellation of the user account, your Information may be retained for the purpose of legal and regulatory

compliances, resolving disputes, concluding activities related to account cancellation, enforcing our agreements, Privacy Policy or for any other reason which may be deemed necessary. However, your Information will get anonymized upon cancellation of user account except for the abovementioned purposes.

#### **10. Indemnification**

You agree and undertake to indemnify and hold harmless KIN including its directors, employees, successors and assigns, from and against any and all suit(s), dispute(s), action(s), damage(s), cost(s) and expense(s), if any, of whatsoever nature, arising out of or in any way connected with this Privacy Policy, Information and/or your use or access to UVO.

You expressly understand that under no circumstances, including, but not limited to, negligence, shall we be liable to you or any other person or entity for any direct, indirect, incidental, special, or consequential damages, including, but not limited to damages for loss of profits, goodwill, use, data or other intangible losses, resulting from circumstances, including but not limited to: (i) unauthorized access to or alteration of Information; (ii) any unauthorized access to or use of our secure servers and/or any and all Information stored therein.

You represent that you have accessed UVO and have provided Information on your own initiative and are responsible for compliance with all applicable laws including, but not limited to, any applicable local laws.

#### **11. Governing Law**

This Privacy Policy is governed by the laws of India and the appropriate courts at Delhi shall have the exclusive jurisdiction.

#### **12. Acceptance of terms of the Privacy Policy by you**

This Privacy Policy is applicable on you and occupants in your vehicle when you access and use UVO. You hereby expressly consent and authorise on behalf of yourself and occupants in your vehicle, KIN to collect, store, process, retain, disclose, record or transfer the Information that voluntarily supplied herein and process and use it by KIN or its affiliates, associates, dealers, agencies, etc. to fulfil your requests for products, services, etc. and to contact you through outbound call by telephone/ mobile numbers or send SMS or email about offers, marketing and/or promotions, product related Information, newsletter, market survey, poll, research, study, programs, enquiries about offerings, services, service reminders and other legitimate purposes. By using UVO, you signify your acceptance of the Privacy Policy. If you do not agree to this Privacy Policy and/or to our processing of your data/Information in the manner outlined in this Privacy Policy, please do not use UVO or submit any personal data to us.

#### **13. Grievances**

If you have any grievances, please inform us by writing an email at [kiacare@Kiaindia.net.in](mailto:kiacare@Kiaindia.net.in) or send a letter to KIN's Sales & Marketing Head Quarters at:

**Kia India Pvt. Ltd.**

16th floor, Two Horizon Center,  
Golf Course Road, DLF Phase-5  
Sector 43, Gurugram -122002  
Haryana, India.

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