# Honda - MaRIS Pay & Go

# **Privacy and Cookies Policy**

Honda recognises the importance of the honest and responsible use of your personal information. This Privacy and Cookies Policy ("Policy") applies to the website www.techinfo.honda-eu.com (the "Website") and describes how and for what purposes Honda Motor Europe Limited ("Honda", "we", "us" and/or "our") collects and processes personal information about you when you visit the Website and when you contact Honda in relation to the Website, using the contact options detailed within this Policy or on the Website.

The Website is controlled by Honda and Honda will be the data controller of any personal data collected through the Website and may be contacted via the following e-mail address: honda.maris@honda-eu.com

Please note that in providing the Website services, Honda currently uses RedTree NV (a company registered in Belgium, with its address at Veldkant 31, 2550 Kontich, Belgium) to provide maintenance for the Website.

All references in this Policy to the Group should mean the Honda group companies whether subsidiary companies, affiliates or otherwise (the "**Group**"), unless stated to the contrary.

Depending on your relationship with Honda, we may also provide or may have already provided you with other notices about our use of your personal information, for example where you already have a contractual relationship with Honda or where you have previously purchased parts and/or services from Honda, you may have agreed to our contacting you in relation to such products and/or services, or in relation to the receipt of other communications or marketing information from Honda. Those notices are not replaced by this Policy and are, therefore, still in effect, as may be applicable.

#### What type of personal data does Honda collect and process?

- 1.1 When you register to use the Honda Maintenance and Repair Information System (the "**Service**") on the Website, we will collect the following personal data from you:
  - 1.1.1 your name (and also, where relevant, the name of the company or trading name of the independent dealer you represent);
  - 1.1.2 your contact details, including postal address, telephone number and e-mail address;
  - 1.1.3 your country of residence;

- 1.1.4 for payment purposes, an invoice address, payment details and (where applicable) VAT number, which may or may not include personal data; and/or
- 1.1.5 information necessary for legal compliance.
- 1.2 Where you contact us through the Website (whether you are registered user of the Services or not), we may collect the following personal data from you:
  - 1.2.1 your name and contact details, including postal address, telephone number and e-mail address;
  - 1.2.2 the reason for your contact; and/or
  - 1.2.3 information necessary for legal compliance.
- 1.3 This information will be collected primarily from you but we may also collect it, where lawful to do so, from and combine it with information which we may already hold about you (for example, if you have already purchased products and/or services from Honda or have had previous contact with Honda) or have obtained from public sources, third party service providers, government, tax and/or law enforcement agencies, and other third parties. We may also collect personal data about you from your use of our other Group services.

### 2. How does Honda use your personal data?

- We may use information about you (subject to your consent or in accordance with another other lawful reason, where required):
  - 2.1.1 to fulfil orders placed with Honda;
  - 2.1.2 to perform any contract Honda has with you;
  - 2.1.3 to respond and/or deal with your request or enquiry;
  - 2.1.4 to improve the functionality of the Website
  - 2.1.5 to provide us with information in order to improve our products and services and develop new products and services;
  - 2.1.6 to administer the Website;
  - 2.1.7 for internal record keeping, including but not limited to details regarding products and/or services purchased by a registered user of the Services (a "**User**") and to assist with customer complaints;
  - 2.1.8 where necessary as part of any restructuring or sale of Honda or a relevant Group company's business or assets;

- 2.1.9 for compliance with legal, regulatory and other good governance obligations;
- 2.1.10 to contact you (directly, either by Honda or by the Group or through a relevant partner or agent) by e-mail for the above reasons;
- 2.1.11 to provide you with information regarding the Service and to notify you of changes to the Services (with your consent, where required);
- 2.1.12 to provide us with broad demographic data by using the details of your country of residence that you have provided to us; and/or
- 2.1.13 for any other purposes related to the management of your legal relationship with Honda.

This list may be updated from time to time as Honda's business needs and legal requirements dictate. In the event that this Policy is updated, we will provide you with notice of this update to the extent required by law.

2.2 We may also process your personal data for other legitimate business purposes including but not limited to management analysis, audit, forecasts, business planning and transactions, ensuring our compliance with applicable laws, regulatory requirements and Honda policies, and dealing with legal claims and related administrative activities and related records retention. We may also process it to establish or exercise our legal rights and to comply with law enforcement or other government agency requests or court orders.

#### Does Honda share personal data with third parties?

- 2.3 Your personal data will be made available for the purposes mentioned above (or as otherwise notified to you from time to time and where there is a lawful reason to do so), not only with Honda and the wider Honda Group, but also with our third party service providers, RedTree NV and (for the purposes of processing payment collection on behalf of Honda) Atos Worldline SA and Atos Worldline NV, and any other service providers we may appoint from time to time.
- 2.4 We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and/or for tax or other purposes. Personal data may also be released to external parties in response to legal process, and when required to comply with laws, or to enforce our agreements, corporate policies, and/or terms of use or supply, or to protect the rights, property or safety of Honda.
- 2.5 In addition, we may disclose your personal data to prospective or actual buyers in the event that Honda or any part of the Group sells all or any of its business or assets.

2.6 By providing your information to Honda through the Website, the provision of your information will also act as your consent to the transfer of your personal data as set out in this Policy.

## 3. Will your personal data be transferred abroad?

3.1 All personal data processed through the Website will be held and processed within the European Economic Area ("**EEA**") and Honda does not transfer any personal data it obtains in relation to the Website or the Service to any jurisdiction outside the EEA unless it is lawfully permitted to do so.

## 4. Does Honda use my personal data for direct marketing?

4.1 Honda does not currently use any personal data you provide by using the Website or registering to use the Service, for direct marketing purposes.

## 5. What safeguards are in place to protect your personal data?

- 5.1 Subject to paragraph 5.2 (below), Honda takes steps to seek to protect the security of your personal data in accordance with applicable law.
- 5.2 As for all website operations, we cannot guarantee the security of any transmission of personal data over the Internet. Communications over the Internet such as e-mails are not secure unless they have been encrypted. So, while we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us. Please do not submit personal data through the Website unless you accept the inherent security risks and implications of using the Internet.

## 6. What rights do you have to review, amend and or delete personal data?

- 6.1 You have the right to request certain information about the processing of your personal data. These rights vary depending on the country you are based in, but generally include (amongst others) the right to request copies of, access, and, in certain circumstances under applicable laws, oppose the processing of your personal data and/or request the deletion of your personal data held by Honda and to have certain inaccurate information about you corrected.
- 6.2 If you believe that any information we have about you is incorrect or incomplete, please write to or e-mail us as soon as possible. We will take steps to seek to correct or update any information as necessary and in accordance with applicable law and pursuant to our checks on whether that information is in need of correction or update.
- 6.3 All requests to amend, update, delete, access or to obtain copies of your personal data will be processed in accordance with applicable law.

6.4 Where the processing of your personal data is done with your consent, please note you have the right to withdraw your consent at any time. If you wish to withdraw your consent, please contact us at: honda.maris@honda-eu.com

## 7. Keeping you informed and record retention

7.1 Honda may keep your details on record for as long as is necessary for the purposes for which it may use your personal data, as set out above and as allowed in accordance with applicable law.

### 8. Cookies

- 8.1 We use "cookies" for certain areas of our Website. Cookies are small data files stored on your hard drive by a website. Cookies help us monitor and improve the functionality and usage of our Website and your experience of the Website. We use cookies to [see which areas and features are popular and to count visits to our websites, to recognise you as a returning visitor and/or to tailor your experience of the Website according to your preferences.
- 8.2 To delete or block cookies on the Website, you can do this through your browser settings at any time and for more general information about cookies including the difference between session and persistent cookies, visit www.allaboutcookies.org.
- 8.3 The cookies used on our Website may be categorised, as follows
  - 8.3.1 Cookies which are **"strictly necessary**" for functionality of the Website's platforms. These cookies are essential in order to enable users to move around the Website and use its features;
  - 8.3.2 **"Functionality**" cookies which allow the Website to remember choices you make and your preferences, for example where you register/sign-up for events, products and/or services;
  - 8.3.3 "Performance/Analytical" cookies which collect information about how users navigate the Website; for example, which pages users access most frequently. They identify how users interact with our Website, any errors that occur, which pages are not used often, which pages take a long time to load, which pages users tend to visit and in what order. These cookies do not collect any information which could identify you and are only used to help us improve how our Website works and understand what interests our Website's users.
- 8.4 A summary of the first party cookies which we use on our Website are set out below (at present we do not use third party cookies on our website:

Cookie name/type	Expiration Period	Purpose	Category of cookie as defined in the International Chamber of Commerce UK Cookie Guide
Identification cookie	Session	This enables us to remember who you are across each of the pages you visit and, where appropriate, what information you may have entered on a previous page.	Functionality
Language Cookie	Persistent	This enables us to set and remember your language preference when you visit the Website	Functionality
Cookie Acceptance	Persistent	This enables us to track when you've accepted the use of cookies on the Website	Functionality
Terms & Conditions Cookie	Persistent	This enables us to track when you've been informed about new version of Terms & Conditions on the Website	Functionality
Privacy Policy Cookie	Persistent	This enables us to track when you've been informed about new version of Privacy Policy on the Honda Website	Functionality

#### 9. Your consent to our use of Cookies

- 9.1 We may need to ask for your consent to the use of certain cookies set out in this Policy when you access the Website. Accordingly, when you first visit the Website, a box/banner will appear which advises you of the use of cookies on the Website and advises you that by continuing to use the Website, you consent to the setting of cookies which are used on the Website which are summarised above. The box/banner will also advise that you may oppose the use of cookies and refer you to you browser settings.
- 9.2 **You can usually set** your browser to warn you when a cookie is being sent or to remove or reject cookies. Each browser is different, so look at your browser 'Help' menu to learn the correct way to modify your cookie settings. If you choose to remove or reject cookies, it may affect features or services on our Website.
- 9.3 **If you agree to cookies** from our Website by continuing to use the Website, and you later wish to delete the cookies we have set on your device, please refer to your browser 'Help' menu.

#### 10. Changes to this Privacy and Cookies Policy

- 10.1 We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We will update the date at the top of the Policy accordingly.
- 10.2 Where required to do so by law, we will provide notice of any changes. However, we encourage you to check this Policy for changes when you revisit the Website.
- 10.3 Subject to any other legal requirements, by using the Website, submitting your personal data to us and/or registering an account to receive the Service, you consent to the use and processing of your personal data as described in this Policy (as amended from time to time).

#### 11. Contact us

If you have any questions about this Policy, please contact us at honda.maris@honda-eu.com

Last Updated: April 2015