



## Privacy notice

Groupe Renault continues to ensure compliance with regulations on protection of personal data (hereinafter the "personal data") and puts it at the heart of its ethics, as described in its Group Personal Data Protection Policy available at <https://group.renault.com/nos-engagements/le-groupe-renault-et-vos-donnees-personnelles/>

Indeed, Groupe Renault believes that personal data protection is essential for building a relationship of trust with its customers. As such, it intends to ensure the greatest transparency in the personal data processing that it carries out on the personal data that its customers provide or that it collects through the various contacts its customers may have with it.

The purpose of this privacy notice is to provide you with detailed information about the conditions for the processing of your personal data by Groupe Renault to provide you the R&Go / Dacia Media service, as well as the rights and options available to you to control your personal data and protect your privacy.

For more information on data processing by Renault (trading as Dacia) for other services in Malta, <https://www.renault.com.mt/privacypolicy.html>

### 1- WHO PROCESSES YOUR PERSONAL DATA?

**Renault SAS** processes your personal data as an independent data controller. The contact details for Renault SAS' Data Protection Officer are as follows: Renault SAS, Direction juridique – Délégué à la protection des données, 13/15 quai le Gallo 92100 Boulogne-Billancourt.

### 2- WHAT PERSONAL DATA DO WE PROCESS?

"Personal data" means any information that can be used to identify you either directly (such as your name) or indirectly (e.g. using a unique customer number).

Generally speaking, we undertake to collect only the personal data necessary for each of the purposes for which we process your personal data.

The personal data we collect depends on our interaction with you and may include information about:

- Your **identity** and **contact details** (surname, first name, postal address, email address, telephone, etc.),
- Your **vehicle identification** data (brand, model, registration, VIN number, etc.),
- Data concerning **the use of our mobile app**, as well as our communications.



As such, the data required to respond to your request or meet the needs of a contract or legal obligation is pointed out in the collection forms (in particular by asterisks). If you do not wish to provide the mandatory data, we may not be able to process your request or provide you with the relevant services.

We encourage you to keep us regularly informed in writing of any changes to your personal data.

Other than the data provided by you to register for your Dacia Media account, Renault does not collect Personal Data from your vehicle or phone when you're using the Dacia Media application (e.g. eco score, Speed, Fuel Consumption, Trip report, Vehicle Settings, contact list, last trip details, distance to destination). You retain full control over this data as this data is stored on your phone, and can delete it at any time by deleting and uninstalling the application from your phone.

**3- WHAT IS YOUR PERSONAL DATA USED FOR?**

Within the context of our relationship, and in line with the context in which your personal data is collected, we may use your data to:

A - Manage our commercial relationship

Objectives	Legal basis
Management of your complaints	This processing is based on our legitimate interests (prevention of legal action)
Responding to your possible requests to exercise rights in relation to your personal data (see the section on "your rights")	This processing is based on our legal obligations and may involve checking your identity

When you are in contact with our call centres, our objective is to best meet your demands. To improve the quality of our services and to train and assess our employees, your calls may be recorded. However, you may oppose this at any time and without reason.

B - Manage services provided by your connected vehicle and on-board applications

Objectives	Legal basis
Provide you with connected services and on-board applications	This processing is justified by the fulfilment of the agreement you have entered into with us

You can obtain more information about the processing of your personal data by third parties by consulting their privacy policy. Renault does not collect or share your vehicle journey data with third parties, if you choose to use any third party applications while using the Dacia Media application, you should refer to the third party terms.



We are committed to respecting your privacy, but we remind you that it is your responsibility to inform any other user or the buyer of the vehicle about the conditions of processing of their personal data.

C - Conduct studies and analyses

Studies and analyses are conducted to measure our performance, assess the quality of our products and services and the level of customer satisfaction, and to continuously improve them.

Objectives	Legal basis
Conduct analyses to improve customer satisfaction	This processing is based on our legitimate interests (to improve our products and services)

**3.3 – The length of time for which we keep your data**

In accordance with the regulations, we are committed to keeping your personal data only for the time necessary to achieve the objective pursued, to meet your needs, or to meet our legal obligations.

In determining this time, we take into account, in particular, the following:

- The length of your contract, and
- The time required to process your request or complaint.

When we no longer need to use your personal data, it is deleted from our systems and records or made anonymous so that we can no longer identify you. However, it may be necessary to archive some of your personal data in order to be able to respond to any legal proceedings, throughout the statute of limitations provided for in the applicable legislation.

**4- WHO HAS ACCESS TO YOUR PERSONAL DATA?**

Within Groupe Renault, we ensure that only those people who are duly authorised for their functions and tasks to process your personal data are allowed access.

In order to process all or part of your personal data, we call upon trusted third-party providers acting as processors in accordance with our instructions and solely on our behalf, including:

- Hosting, operation or maintenance of our databases,
- Customer relations management to deal with your enquiries (call centres, communication tools, etc.)

For all of this data sharing, we ensure that we only work with trusted companies and secure these relationships (contracts, audits, guarantees and security tests, etc.).

In some cases, we may share some of your personal data with partners, who will use it for their own purposes. In such a case, these partners shall act as data controllers and their personal data processing policy shall apply to the data shared. We make sure to ask you for your consent to this sharing when required by the regulations, or at least to enable you to object.



## **5- WHAT ARE YOUR RIGHTS?**

### **5.1- Your rights**

You have several rights under personal data protection regulations:

**A right to object to** the processing of your personal data, provided you have grounds connected with your particular situation, and the right to request the **limitation** of your personal data processing, in some cases as provided for in regulations.

**A right to information:** you have the right to obtain clear, transparent and understandable information about how we use your personal data and about your rights. This policy is an example of this.

**A right of access to your personal data:** you have the right to obtain information concerning the processing of your personal data (including the data that is used, for what purposes, etc.) and a copy thereof.

**A right of rectification:** you have the right to correct your data if it is inaccurate or incomplete, despite our efforts to keep it up to date, enabling us to comply with our obligation to have up-to-date data about you.

**A right to the portability** of your data, i.e., under certain conditions, the right to receive the personal data you have provided to us, in a structured, commonly used computerised format, and for it to be transmitted to a third party if technically possible.

**A right to erasure** (or right to be forgotten): you have the right to have your data erased or deleted. This right may be limited in light of our contractual or legal obligations (contract in progress) (prevention of legal action in particular).

**A right to define** either general or specific **guidelines** regarding certain types of processing, with respect to the retention, deletion and communication of your personal data **in the event of your death**. You may change or delete these guidelines at any time. You may share these special guidelines with us by writing to the address below.

Finally, you have the right to lodge a complaint with the Information and Data Protection Commissioner <https://idpc.org.mt/> about the processing of your personal data. We encourage you to contact us prior to any claim, so that we may attempt to resolve your problem together. If you have any questions regarding the processing of your data, please contact [dataprotectionofficer@autosales.com.mt](mailto:dataprotectionofficer@autosales.com.mt).

### **5.2- How do I exercise them?**

You can update your contact details and manage your marketing preferences directly in your user account (MyRenault, MyDacia, etc.).



To exercise any of your rights please either contact us by phone on: +356 21433601 (Standard network rates apply from mobile or landline phones) or by email : [dataprotectionofficer@autosales.com.mt](mailto:dataprotectionofficer@autosales.com.mt). You can also write to us at: Data Protection Officer, Auto Sales Limited, Mosta Road, Lija LJA 9011 Malta. We may request certain information or documents (identity document, vehicle registration document) when we fail to identify you or to identify your vehicle data.

## **6- HOW IS YOUR PERSONAL DATA KEPT SECURE?**

Your personal data is stored on secure servers. We put in place, and require from our processors and partners, appropriate data security and data protection measures in line with the latest technologies.

When personal data processing involves transferring data, we ensure that this transfer is carried out under appropriate conditions that ensure an adequate level of protection, security and confidentiality.

Whenever possible, your data is processed in Malta and the European Economic Area (EEA). However, as some of our service providers or their processors are located in countries outside of the EEA, your personal data may be processed in those countries. Some of these countries may have different personal data regulations from those of the European Union. In such a case, (i) we pay particular attention to ensuring that this transfer is carried out in accordance with the applicable regulations and (ii) we put in place safeguards ensuring an adequate level of protection of your privacy and fundamental rights (in particular by using the European Commission's standard contractual clauses). Upon simple request sent to the address indicated in the "What are your rights?" section, we can provide you with more information on such transfers (in particular the European Commission's standard contractual clauses).

## **7- MODIFICATION OF INFORMATION**

We may change this information from time to time. We will inform you and/or seek your consent whenever such consent is necessary or required. We therefore recommend that you consult this policy each time you visit the application in order to review the latest version.

*Version 1 updated on 23.04.2021*

*This new version is a major overhaul of the previous version. It is more accessible and more comprehensive. Here you can find all the terms and conditions governing use of your personal data (in particular the complete list of our purposes). The processing of your personal data for connected services and on-board applications is now included in this policy. We provide you with new information about profiling. This version also provides more transparency about the recipients of your personal data, within or outside our group.*

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