

PRIVACY POLICY

Last update: **September 21, 2022**

The Nissan Connect Door to Door Navigation app (the “**App**”), published by Nissan Motor Co., Ltd (“**Nissan**” or “**we**”), is a GPS navigation app that guides you “door to door” from one destination to the next, and back to your Nissan vehicle again.

In particular, the App provides you with the following features:

- Find My Car: when your device is connected to the navigation system of your Nissan vehicle, the App receives the current location of your Nissan vehicle. When you leave your Nissan vehicle, you receive a notification on your device and your Nissan vehicle’s location will be shown on the map in order to find it later;
- Final Destination Navigation: when your device is connected to the navigation system of your Nissan vehicle, the App receives the current location of your Nissan vehicle, the address where you parked, and it will be shown on the map. A walking route will be available to get you to your final destination if you are within 5 kilometers (3 miles) from the final destination. If you are located further than 5 kilometers (3 miles) away from your final destination, a walking route will not be automatically generated; and
- Send a destination to your Nissan vehicle: use the App to find a destination and send it to your Nissan vehicle.

When accessing, browsing and using the App and the associated services, you provide Nissan with your personal data. **As publisher, Nissan acts as the data controller of your personal data and processes such data with the assistance of TomTom as data processor.**

Please **read this privacy policy carefully** as it explains **how Nissan uses your personal data and how you can exercise your rights about it**. This privacy policy supplements the [Terms and Conditions of the App](#) and any documents or notices that may refer to this privacy policy.

Should you have any questions related to privacy, you may directly contact the Data Protection Contact Point of Nissan by sending an email to NML_Globaldataprivacyoffice@mail.nissan.co.jp.

1. WHAT KIND OF PERSONAL DATA ARE COLLECTED BY NISSAN?

Type of data	Examples of data
Contact details	Email address
Data related to location	Real-time location of your device, real-time location of your Nissan vehicle

Data related to navigation	Your final destination, the distance to your final destination, your arrival time, the driving directions, the walking directions, address of where your Nissan vehicle is parked, your saved destinations (home, work, other destinations), information from your address book (including identification data and addresses of your contacts), your navigation settings (frequency of traffic updates, units of distance, etc.)
Data related to the App	Version of the App, version of the maps uploaded in the App

When you decide to allow access to your address book in the App, you provide Nissan with personal data related to third party/ies (i.e. identification data and addresses). Under such circumstances, we would like to remind you that **it is your responsibility to inform your contacts about the transmission and use of their personal data by Nissan** and to provide them with this privacy policy.

Certain personal data may be mandatory or optional, depending on your request. Mandatory data will be marked as such at the point of collection. **If you refuse to provide mandatory data, Nissan may not be able to process your request** (e.g. creation of your user account, connecting the App to your Nissan vehicle, provision of the GPS navigation services through the App, etc.).

2. FOR WHAT PURPOSES DOES NISSAN USE YOUR PERSONAL DATA?

Nissan uses your personal data for the following purposes only:

Purposes	Examples of use of your personal data	Legal grounds
Creation and management of your user account	<ul style="list-style-type: none"> to create your user account to authenticate yourself on the App in order to save your favorite destinations to update your user account as needed 	Application of the Terms and Conditions of the App
Performance of the GPS navigation services	<ul style="list-style-type: none"> to locate your device in real time (with a reminder to be approved that there is a real-time location functionality), in order to provide you with the GPS navigation services 	Application of the Terms and Conditions

	<ul style="list-style-type: none"> • to locate your Nissan vehicle in real time (with a reminder to be approved that there is a real-time location functionality), in order to provide you with the GPS navigation services • to share your final destination with your Nissan vehicle's navigation system by connecting the App with your Nissan vehicle • to guide you to your final destination while driving • to guide you to your final destination by walking, after you have parked your Nissan vehicle • to memorize your Nissan vehicle's location for guiding you back to your Nissan vehicle again • to save your favorite destinations in order to access them more quickly • to share your Nissan vehicle location with a different navigation application on your device • to automatically download the updated vehicles traffic and maps on the App 	
<p>Navigation to saved / favorite destinations</p>	<ul style="list-style-type: none"> • to allow access to your address book by the App, in order to guide you to the selected addresses of your contacts 	<p>Your consent</p>

Improving the App and the associated services, as well as your user experience	<ul style="list-style-type: none"> • to improve the App and the associated services • to facilitate your browsing through the App • to take steps designed to protect the security of the App 	Legitimate interest of Nissan to improve the App and the associated services, as well as your user experience
Pre-litigation or litigation management	<ul style="list-style-type: none"> • to manage any dispute or litigation 	Legitimate interest of Nissan in defending its rights and interests
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> • to comply with legal and regulatory obligations • to process your requests to exercise your rights 	Legal and regulatory obligations to which Nissan is subject

3. WHO CAN ACCESS YOUR PERSONAL DATA?

Your personal data may be transmitted to the following recipients when you access, browse and use the App and the associated services:

Recipients	Purposes
Nissan and its duly authorized employees	To manage the App and the associated services as specified in section 2 of this privacy policy
TomTom	As data processor, to perform the GPS navigation services on behalf of Nissan
Nissan service providers (hosting provider, IT service providers, etc.)	Exclusively for operational and technical purposes related to the management of the App and the associated services
Administrative or judiciary authorities	Exclusively in the case of an express and justified request or in case of an alleged violation of legal or regulatory provisions
Lawyers and all interested parties	Exclusively in the case of the management of possible disputes and other legal matters where appropriate

4. WILL YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE OF THE EUROPEAN UNION(EU)/EUROPEAN ECONOMIC AREA(EEA)/UNITED KINGDOM(UK)/SWITZERLAND?

As Nissan, its affiliates, and some of its services providers are located in countries outside the EU/EEA/UK/SWITZERLAND, your personal data is processed in third countries.

When your personal data is transferred to such third countries, Nissan, in the absence of an adequacy decision and, where appropriate, after having carried out an assessment of the suitability of your rights on the territory of the third country, implements the legal and/or contractual safeguards required by the applicable data protection laws (such as European Standard Contractual Clauses).

5. HOW DOES NISSAN PROTECT YOUR PERSONAL DATA?

Nissan has implemented technical and organizational security measures to protect your personal data, in particular against potential personal data breach. These measures will guarantee a level of security appropriate for the personal data and will take into account the state of the art and the cost of implementation in relation to the risks and nature of the personal data to be protected.

Nissan guarantees that its employees and any other persons processing your personal data will respect Nissan's internal rules and procedures related to personal data protection. In this context, Nissan regularly reviews and updates its practices to enhance your privacy and ensures that its internal rules and procedures are duly followed.

If you have found a vulnerability or would like to report a security incident, you may directly contact the Data Protection Contact Point of Nissan by sending an email to NML_Globaldataprivacyoffice@mail.nissan.co.jp.

6. FOR HOW LONG IS YOUR PERSONAL DATA STORED?

As a general rule, your personal data will only be retained for the period necessary for the accomplishment of the purposes for which said data was collected.

In particular:

- **data related to your user account** is kept **until the deletion of your user account or after two (2) years of inactivity on your user account**;
- **data related to the GPS navigation services** is kept **until the completed provision of the requested service or until their deletion if you have decided to save them on the App**;
- **your Internet or other electronic network activity information** is kept for a period of **thirteen (13) months from the collection**.

Beyond these retention periods, personal data can be stored for evidentiary purposes only during **the applicable statute of limitations (e.g. most frequent of these retention periods are usually between 5 to 7 years for such purposes)**.

7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

If you are based in the EU/EEA/UK/SWITZERLAND, you have the following rights over your personal data:

- you can **request access** to your personal data in order to obtain **clear, transparent and understandable information** on how Nissan processes your personal data (as provided in this policy), as well as **a copy of your personal data**.
- you can request the **rectification** of your personal data in order to obtain the modification of your personal data if it is **obsolete, inaccurate or incomplete**.
- you can **object to the processing of your personal data** when the processing is based on Nissan's legitimate interest. Nissan **will no longer process your personal data unless Nissan demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms** such as the respect of a legal obligation (e.g. legal obligation involving the retention of documents), or for the establishment, exercise or defense of legal claims.
- **except if you are based in Switzerland**, you can request the **restriction of the processing during a limited period of time**, in particular in order to carry out some verifications, where one of the following applies:
 - you contest the accuracy of your personal data, the processing of which is thus restricted for the period necessary for Nissan to verify the accuracy of such personal data;
 - the processing is unlawful and, rather than requesting its deletion, you prefer to restrict its use;
 - Nissan no longer needs your personal data for the purposes of the processing, but you need them for the establishment, exercise or defense of legal claims;
 - you have objected to the processing, which is thus restricted pending the verification of whether the compelling legitimate grounds of Nissan may override your interests, rights and freedoms.
- you can **withdraw your consent** at any time, without this withdrawal affecting the lawfulness of the processing operations previously carried out.

- **except if you are based in Switzerland**, you can ask to **receive your personal data in a structured, commonly used and machine-readable format** and also can request **their transmission to another data controller** where technically feasible. **This right is not exercisable in all circumstances. The right applies only if it fulfils all the following conditions:**
 - your request is only related to your personal data (excluding anonymous or third-party data);
 - your request does not adversely affect the rights or freedoms of others, in particular those of Nissan (e.g., trade secrets) or those of third parties (e.g., intellectual property);
 - the processing is carried out by automated means (paper files are therefore not included);
 - the processing is based on consent or the performance of a contract.
- you can request the **deletion of your personal data (also known as the right to be forgotten)**, where one of the following legal grounds applies:
 - you object to the processing of your personal data and there are no overriding legitimate reasons justifying the processing of your personal data (e.g., legal obligation involving the retention of documents);
 - you decide to withdraw your consent on which the processing is based;
 - your personal data are no longer useful for the original purposes for which they were collected or for any other type of processing;
 - the use that is made of your data does not comply with the applicable legal or regulatory provisions.

Depending on your country of residence, you may have additional rights with respect to the processing of your personal data.

Under certain circumstances, **Nissan may ask you for specific information in order to confirm your identity and ensure the exercise of your rights**. This is another appropriate security measure to ensure that personal data is not disclosed to an individual who does not have the right to receive it.

If you have any questions related to privacy or wish to exercise your rights, you may directly contact the Data Protection Contact Point of Nissan by sending an email to NML_Globaldataprivacyoffice@mail.nissan.co.jp.

If you wish, you may also **lodge a complaint with your national data protection authority**. This right may be exercised at any time and free of charge, at the exclusion of potential postal fees or expenses related to legal representation or assistance should you choose to engage third party assistance for the procedure.

8. Changes to this policy

This privacy policy may be amended from time to time, in particular to reflect changes in the services provided by the App or the applicable laws. Nissan will provide you with the updated privacy policy by any appropriate means if required by the applicable laws. In any case, **we recommend that you review this privacy policy each time you use the App.**