

1. FIRST INFORMATIVE LAYER

Responsible: SEAT METROPOLIS LAB BARCELONA, S.A., (SEAT CODE), Autovía A-2, Km. 585, Martorell, Barcelona (Spain).

Purposes:

- Register you as a user for the use of the Application.
- Correctly offer you the services of the Application.
- Attend to your queries, incidents and/ or claims.
- Geolocate your eScooter in order to correctly provide you with all the functionalities of the Application, as well as to guarantee the security of the eScooter itself (movement alert system).
- If you have consented, to send you commercial communications and to use your location to send it to those users you choose.

Legal basis: Execution of a contract (Art. 6.1.b GDPR)

Rights: mydata@code.seat

2. DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA

Via this Privacy Policy, we inform you about the collection, processing and use of your personal data through the use of the My SEAT MÓ application (hereinafter, the "**Application**").

Who is responsible for the processing of your data?

Identity: SEAT METROPOLIS LAB BARCELONA, S.A., (SEAT CODE)

Address: Autovía A-2, Km. 585, Martorell, Barcelona (Spain).

Contact: mydata@code.seat

What is the purpose of processing your data and what is the applicable legal basis?

At SEAT CODE we will process the personal data you provide us, as well as all those collected through the use of the Application, with the following main purposes:

- Register you as a user of our Application, which will allow you access to the services offered through it.
- After proceeding to link your eScooter with the Application, correctly offer you all the services presented through the Application, which will mainly consist of you being able to access information about your eScooter and its use, as well as being able to use it. We may send you notifications.
- Attend to the queries, requests and/or claims that you send us through any contact channel.
- Geolocate the eScooter to be able to offer you the necessary information offered by all the functionalities of the Application, as well as for security purposes (alert system in case of eScooter movement).
- Collect vehicle information to be able to correctly offer you all the services provided through the application and improve the product.

The processing of your data for these purposes is necessary for the provision of the services included in the application, so the legal basis that legitimizes the processing of your data in the sense explained is the execution of the Conditions of Use as provided in article 6.1. b) of the General Data Protection Regulation (GDPR).

Likewise, and only if you consent, to send you commercial communications about SEAT CODE products and services. The legal basis that legitimizes the processing of your data for this purpose is the express consent given by you as provided in article 6.1. a) of the GDPR. We inform you that you may withdraw your consent at any time without affecting the legality of the processing based on the consent prior to its withdrawal.

What data do we process?

Within the framework of the provision of the services offered by the Application, we will process the following categories of data:

- Identifying and contact data, for example, by way of illustration, but not limited to: name, surname, telephone, email address, driving license.
- Data on the use of your vehicle: date, time and place of vehicle use, journey log, actions performed during vehicle operation.
- Data about your vehicle, for example, by way of illustration, but not limited to: chassis number, registration number, order number, workshop visits, warranty information.
- Data necessary to comply with legal and/or contractual obligations.
- Data on social circumstances, hobbies, personal characteristics and other data of interest.
- Data on the use of the Application, for example, by way of illustration, but not limited to: IP information, operating system used, navigation in the Application.

To whom will the data be communicated?

Your personal data will not be communicated to third parties except for the fulfillment of legal obligations arising from your relationship with us. It should be noted that, in order to provide you with all our services, we require the support of service providers, whether they are companies of the SEAT group or independent third parties. To do this, it will be necessary for these third parties to access your personal data, always acting according to our instructions and on behalf of SEAT CODE. In no case will they have your personal data for their own purposes.

How long will we keep your data?

Your personal data will be kept as long as it is necessary for the purpose for which it was collected, that is, as long as you are considered a user of the Application. As soon as you cease to be considered a user, your personal data will be duly blocked for the purpose of complying with possible legal obligations arising from your relationship with us. Once the period in which these responsibilities can arise has elapsed, your data will be deleted.

What are your rights as the data subject?

As the data subject, you can exercise the following rights before SEAT CODE:

- **Access:** You can obtain confirmation if SEAT CODE processes your personal data, as well as consult your personal data included in SEAT CODE's files.

- **Rectification:** You can modify your personal data when it is inaccurate, as well as complete those that are incomplete.
- **Suppression:** You can request the deletion of your personal data when, among other reasons, the data is no longer necessary for the purposes for which it was collected.
- **Opposition:** You can request that your personal data not be processed. SEAT CODE will stop processing the data, except for compelling legitimate reasons, or the exercise or defense of possible claims.
- **Limitation of processing:** You can request the limitation of the processing of your data in the following cases:
 - While the challenge to the accuracy of your data is being verified;
 - When the processing is unlawful and you have opposed the deletion of your data and request the limitation of its use;
 - When SEAT CODE does not need to process your data, but you need it for the exercise or defense of claims;
 - When you have opposed the processing of your data for the fulfillment of a mission of public interest or for the satisfaction of a legitimate interest, while it is verified whether the legitimate reasons for the processing prevail over yours.
- **Portability:** You can receive, in electronic format, the personal data that you have provided us and those that have been obtained from your contractual relationship with SEAT CODE, as well as transmit them to another entity.

You can exercise these rights by written request addressed to SEAT CODE, at the address Autovía A-2, km. 585 Martorell (Barcelona) or by sending an email to mydata@code.seat clearly indicating the right you want to exercise. The exercise of these rights is free of charge unless your rights are exercised excessively or without foundation. If you consider that SEAT CODE has not processed your personal data in accordance with the applicable regulations, you can contact the Personal Data Protection Agency through the website www.agpd.es

How can you contact the data protection officer?

If you have any questions about data protection or wish to contact our data protection officer ("DPO"), you can contact them by sending an email to data.protection@code.seat