

Ford Motor Company of Southern Africa (Manufacturing) (Pty) Ltd

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1. INTRODUCTION

- 1.1. Ford Motor Company of Southern Africa (Pty) Limited (“Ford”, “we”, “our” and “us”) is committed to responsible privacy practices and to complying with the Privacy Principles contained in the Protection of Personal Information Act 2013 (“POPI”). Where applicable, Ford will handle personal information relying on the related bodies corporate exemption and the employee records exemption in the POPI and any other applicable exemptions in the POPI or other legislation.
- 1.2. In this FordPass Privacy Policy, “personal information” has the meaning set out in the POPI. Essentially, personal information is information or an opinion about an identifiable individual.
- 1.3. Through the FordPass App (“App”), Ford collects your personal information. This Ford Pass Privacy Policy will help you understand what personal information we collect through the App and from the vehicle(s) you connect to it, why we collect it and what we do with it. It also explains your rights and how you can contact us with any request or concerns.
- 1.4. We may change our FordPass Privacy Policy from time to time at our discretion. At any time, the latest version of our FordPass Privacy Policy is available here. The FordPass Privacy Policy is also available in FordPass in your account information.

2. INFORMATION WE COLLECT

- 2.1. We collect the following types of information through your use of FordPass or third-party services that integrate with FordPass, which we also may combine with other information we hold about you:
 - Account Management Information: You provide information about yourself when filling in forms in the App, for example when you download the App, create an account or use any of the services offered through the App (“Services”). The information you provide may include your name, email address, street address, telephone number, and Vehicle Identification Number (“VIN”). You must set up an account to use FordPass. We may also collect mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network information. We process and use this data to create and manage your account, to provide you with the Services, and as otherwise described in this Policy. We may combine this data with other information you have previously provided to us (not only through the App), or that we have collected from public sources or third-party service providers, in order to ensure your information is kept up-to-date.
 - Service-related data: Depending on the Services you use, we may collect and use the following information:

Find: We collect the address and any other information you provide in the App. Precise location information is collected from your mobile device in connection with location-based functions of FordPass. If your vehicle has an embedded modem device and you access your vehicle using the App, or if you have a SYNC 3 (or later) enabled vehicle and you connect the App to your vehicle using AppLink, location information will also be collected from your vehicle in connection with location-based functions of FordPass. Location information collected from your mobile device and/or vehicle(s) includes

Global Positioning System (GPS) data and location derived from IP address. This information can be used to determine your device or vehicle's current location, travel direction, and speed. If you have enabled location services on your mobile device, this data may be collected when the App is running in the foreground or background. We may also derive your approximate location from other device data such as Wi-Fi access points, mobile towers, and your IP address, whether location services are on or turned off, through the permission system used by your mobile operating system. We process and use this data to provide you with the Services and as otherwise described in this Policy. This includes showing you nearby fuel, transportation options, points of interest, parking, and Ford dealers, and providing you with relevant directions.

Move: We collect the information you provide through the App, together with information about the vehicle(s) you connect to the App (see the section 'Vehicle data' below) in order to provide you with the Services and as otherwise described in this Policy. For example, we use VIN and mileage information in order to allow you to connect with your Ford dealer and schedule services, and your vehicle data to allow you to check the status of your vehicle.

Guides: If you contact a Ford Guide or communicate with them through live chat, we collect information about your contact with the Ford Guide including calls, emails, messages and live chat. We process and use this data for quality and training purposes, to provide you with the Services and as otherwise described in this Policy. Ford Guides will be able to view your recent use of the App so that they can better assist you.

- **Vehicle data:** You may give us information about your vehicle by filling in forms in the App. This includes VIN, registration number and mileage information. With your consent, we collect and use the GPS geo-location of your mobile device and vehicle(s) you connect to the App (either via embedded modem in the vehicle or by connecting a SYNC 3 (or later) enabled vehicle via AppLink). We may also collect information about the vehicle(s) you connect to the App, such as the VIN, hardware model and part numbers, status of vehicle systems (e.g., fluid levels, tyre pressure), status and diagnostics of vehicle systems, odometer, other information about how the vehicle is performing, and driving characteristics, such as speed, use of accelerator, brakes, steering, seat belts, and other similar information about how the vehicle is used. We process and use this data to provide you with the Services, and as otherwise described in this Policy.
- **Use Profiles:** We collect information about how you use FordPass or third-party services that integrate with FordPass, such as when and for how long you use features and when you contact us, a record of your communication.
- **Technical information about you and your device:** Each time you use the App, it may automatically access from or store to your device technical information including mobile device information, such as software or operating system version, unique device identifiers, IP address and mobile network information, preference settings and details of your use of the App and the Services that you access.
- **Tracking technologies:** FordPass may also use tracking technologies that collect information about how FordPass is used and how it is performing including if it crashes, and which may be able to be connected across devices and over time. These may include cookies (small files that are stored on your computer or device), pixels or web beacons (small pieces of code placed on web pages and content that communicate when the page or content has been viewed), log data (logs created that include IP address, date and time of activity, and the website or location that referred you to FordPass), or third-party analytics tools, such as Adobe Analytics and DynaTrace). Some of these technologies can be limited or deactivated through your browser or device settings, but some cannot. FordPass does not respond to "Do-Not-Track" requests. This does not otherwise limit your ability to use existing functionality of your browser, mobile device or social media accounts to opt-out of Interest-Based Advertising (see clauses 9.5 and 9.6 below for further details).

- 2.2. In addition to the types of personal information identified above, Ford may collect personal information as otherwise permitted or required by law.

3. HOW WE USE INFORMATION WE COLLECT

- 3.1. We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise permitted or required by law.

- 3.2. We use the personal information we collect about you through the App and from the vehicle(s) that you connect to it to provide you with the Services, including those described above.

- 3.3. We also use it for other legitimate purposes, such as to:

- provide you with App functionality and services;
- allow you to control certain vehicle features;
- fulfil your requests and deal with your enquiries;
- manage and improve our business and our relationship with you;
- assess the quality of the services we and dealers provide, and the services our suppliers provide to us or on our behalf;
- personalize your FordPass experience;
- troubleshoot problems;
- conduct research and develop new and improved products, services, and business and marketing strategies;
- comply with legal requirements or requests from public authorities;
- protect or defend our or another's rights or property;
- protect individuals' personal safety; and
- detect, prevent, or otherwise address fraud, security, safety, or privacy issues.

- 3.4. We may also use and disclose your personal information for the purpose of direct marketing to you where:

- you have consented to us doing so; and
- it is otherwise permitted by law.

- 3.5. Direct marketing involves communicating directly with you for the purpose of promoting goods or services to you and to provide you with special offers from Ford or its Dealers. Direct marketing can be delivered by a range of methods including mail, telephone, email, SMS and in-App push notifications. You can update your FordPass marketing contact preferences at any time via the 'Marketing Options' section of the App.

- 3.6. We would also like to make sure the communications we send you and our interactions with you are as relevant to you as possible. As a result, from time to time, we may use information about you collected from public sources (e.g. online resources) and from third parties (such as our service providers, like web hosting providers, analytics providers, or advertising services) to help us determine what Ford products and services you might be interested in. For example, analytics providers and advertising services may analyse the information they collect from online and other sources to provide us with information about your demographics and interests – such as inferences about your age range and the types of products or services that may interest you. We may then send you information about those products and services in

accordance with your contact preferences. Our customer relationship centre may also use the information we hold about you if you contact them with a question or query.

3.7. We may use and share non-personal, anonymous, de-identified and/or aggregated information for any purpose.

4. WHAT HAPPENS IF YOU DON'T PROVIDE PERSONAL INFORMATION?

4.1. Generally, you have no obligation to provide any personal information requested by us. However, if you choose to withhold requested personal information, we may not be able to provide you with the products and services that depend on the collection of that information.

4.2. To create a FordPass account, you will need to provide your email address, first name and last name. If you do not provide this information, you will not be able to create a FordPass account and will not be able to access or use FordPass.

4.3. Certain features of FordPass require us to know your location or collect additional types of data (including personal information), as described in this Privacy Policy. If we do not collect this additional data, we are unable to provide these features to you. If you choose to enable these features, you agree that we may collect and use this data as described in this Privacy Policy and the notices provided to you within the FordPass App.

5. TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

5.1. We may disclose your personal information obtained through the App and from the vehicle(s) you connect to it in connection with the purposes described in this Privacy Policy.

5.2. This may include disclosing your personal information to the following types of third parties:

- Dealers;
- our related companies;
- companies or other organisations that we have engaged to provide services for, or in connection with, us (including mailing vendors, marketing agencies, roadside assistance providers, analytics providers, event hosting services, website and data hosting providers and other information technology providers, for trend analysis, for market research, for promotions and for the provision of statistical sales information to industry bodies);
- our FordPass partners and other third-party services that integrate with FordPass. For example:

to provide you with updated and personalized location search results through your SYNC 3 (or later) in-vehicle system that you have connected to FordPass, we use cloud-based location services provided by Telenav, Inc. (“**Telenav**”). To provide these services, Telenav obtains certain information, including: a unique user ID assigned by Ford, your current GPS location and planned route and/or destination information from your SYNC 3 in-vehicle system, your address or point of interest search requests and search results selections, information about your use of the location search service, its performance, and your related actions and selections. Telenav may use this information to provide, improve, and enhance these products and services, and may store such information for up to two (2) years. By using location search services, you agree that we can disclose this information to Telenav for its use for these purposes. Telenav’s privacy policy is available at: <https://www.telenav.com/legal/policies-privacy-policy>

We share your location, direction and speed in pseudonymous form with HERE, our real-time traffic information provider. HERE's privacy policy is available at: <http://here.com/privacy/privacy-policy/>

- companies who may use your personal information in order to tailor electronic advertising to you (e.g. on a webpage) in relation to our products and services;
- our accountants, insurers, lawyers, auditors and other professional advisers;
- any third parties to whom you have directed or permitted us to disclose your personal information;
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

5.3. Where we disclose your personal information to third parties we will use reasonable commercial efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the processing conditions in terms of the Protection of Personal Information Act, 2013 (“**POPI**”), e.g. by (where commercially practical) including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your personal information.

5.4. If you post information to certain public parts of our website or to our social media pages, you acknowledge that such information may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

5.5. Your personal information will not be “sold” by Ford to any other organisation for that organisation's unrelated independent use. If you have opted in to receive marketing materials from Ford, we may share anonymised “hashed” data with social media advertising partners, such as Facebook, so that they can create Custom Audiences and deliver advertisements on our behalf to their members. Members are identifiable when the social media partner matches our anonymised data to its anonymised data of its users.

6. DOES PERSONAL INFORMATION LEAVE SOUTH AFRICA?

6.1. Some of the third parties to whom we disclose personal information are located outside South Africa. For example, we disclose personal information to our related companies overseas and to our overseas service providers.

6.2. The countries in which these third parties are located will depend on the circumstances. In the ordinary course of business, we commonly disclose personal information to parties located in the United States, India and China (where our Ford group data and business centres are located). Except where an exception applies under POPI, we will take reasonable steps to ensure that such overseas recipients do not breach the processing conditions under POPI in relation to such information.

7. HOW DO WE STORE AND PROTECT PERSONAL INFORMATION?

7.1. Certain types of data that are collected and generated through your use of the App are stored internally on your mobile device, while other types of data are stored externally on Ford's data processing infrastructure (which is used by Ford to provide certain features of the App).

- Examples of data stored internally on your mobile device include: your country selection, your personal identification number (“PIN”) and any photograph uploaded by you.
- Examples of data stored externally on Ford's data processing infrastructure include: your name, email address, street address, telephone number, VIN and your marketing preferences.

- 7.2. Ford will take reasonable steps to keep any personal information we hold about you secure. However, except to the extent liability cannot be excluded due to the operation of statute, 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 personal information. Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law. Please notify us immediately if you become aware of any breach of security.

8. IS THE PERSONAL INFORMATION WE HOLD ACCURATE?

- 8.1. We endeavour to maintain your personal information as accurately as reasonably possible. We rely on the accuracy of personal information as provided to us both directly (from you) and indirectly (e.g. from a Dealer).
- 8.2. The App allows you to update your profile information and other details (such as your registered vehicles). We rely on all users of the App to keep their details up to date using this function of the App.
- 8.3. If you are having problems with updating your information, we encourage you to contact us if the personal information we hold about you is incorrect or to notify us of a change in your personal information. Our contact details are set out in section 12 of this Privacy Policy.

9. LINKS, COOKIES AND USE OF FORDPASS

- 9.1. FordPass may integrate with or contain links to other apps or websites which are outside of our control and are not covered by this Privacy Policy. This Privacy Policy applies to FordPass and not any linked sites. If you access other sites using the links provided in FordPass, the operators of those other sites may collect information from you. We encourage you to read the privacy policies of each site that collects your personal information.
- 9.2. Ford and its third party service providers and/ or advertising partners use web tracking and storage technology tools such as web beacons, cookies, pixel tags and java code on Ford websites and in emails you have agreed to receive from us to collect or receive information regarding your activities on the site (e.g. your IP address, page(s) visited, time of day). The use of such technology is an industry standard and helps monitor the effectiveness of advertising and how visitors use websites. If selected by you, the Ford websites will store your username and password in a cookie to enable you to be automatically logged in when you return.
- 9.3. We, our third-party service providers and/ or advertising partners use this technology to generate statistics and measure site activity to improve the usefulness of customer visits.
- 9.4. Each time you access Ford websites, Ford and its third-party service providers and / or advertising partners may deliver certain customised information, including ads, to you based on the data stored in your cookie. Third party advertising partners may show our ads on sites on the Internet and serve these ads based on information they collected about a user's prior visits to our website and other Internet activity. Ford may also use analytics data supplied by third party vendors to inform and optimise our ad campaigns. This practice is commonly referred to as "interest-based advertising".
- 9.5. Opting out of Interest-Based Advertising: You may learn about how to opt-out of this kind of collection and use of information for your browser or device by managing your settings, and for your social media accounts by managing your preferences in your account settings.
- 9.6. Opting out from specific advertisers: Facebook: To learn more about how to opt out of Facebook Interest-Based Advertising, go to the Privacy tab on the Facebook website footer, and then select Facebook Ads Controls.

- 9.7. Through the FordPass App, we use your mobile device's unique identifier and tracking and storage technology tools such as cookies, to help provide App functionality, understand how the App is used and personalise your experience. With your consent, we may also use this data to personalise the App advertising you receive. You can provide or withdraw your consent for advertising personalisation at any time through the FordPass "Manage my data" page.

10. HOW YOU CAN ACCESS AND CORRECT PERSONAL INFORMATION WE HOLD ABOUT YOU

- 10.1. You may seek access to personal information which Ford holds about you by contacting us as described in section 12 of this Privacy Policy. We will provide access to that information in accordance with the POPI, subject to certain exemptions which may apply. We may require that the person requesting access provide suitable identification and where permitted by law we may charge an administration fee for granting access to your personal information.
- 10.2. If you become aware that any personal information we hold about you is incorrect or if you wish to update your information, you can either update your details using the App or contact Ford to request the correction or update to your information (see section 12 of this Privacy Policy).
- 10.3. If you wish to access, correct or update personal information held by a Dealer or any of our FordPass partners, or unsubscribe from any communications from the Dealer or FordPass partner, please contact that Dealer or FordPass partner directly.

11. QUERIES, COMMENTS AND COMPLAINTS ABOUT OUR HANDLING OF PERSONAL INFORMATION

- 11.1. If you have any questions, concerns or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or POPI, please contact us (see section 12 of this Privacy Policy).
- 11.2. When contacting us please provide as much detail as possible in relation to your question, concern or complaint.
- 11.3. Ford will take any privacy complaint seriously and any complaint will be assessed by an appropriate person with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.
- 11.4. If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Information Regulator at <https://justice.gov.za/inforeg/>.

12. CONTACT DETAILS

- 12.1. Please address all privacy complaints to:

Attention: Information Officer

Ford Motor Company of Southern Africa (Manufacturing) (Pty) Limited

Simon Vermooten Street

Silverton, Pretoria

OR

gfordpas@ford.com or guidesafrica@ford.com

12.2. If you wish to seek access to or correct or update any personal information we hold about you, or to unsubscribe from or change your contact preferences in relation to our direct marketing, you can also contact us as follows:

- phone the Ford Customer Relationship Centre on 0860 011 022 within South Africa or +27 12 843 5819 from outside of South Africa
- email us at gfordpas@ford.com or guidesafrica@ford.com.