Privacy Notice of SEAT / CUPRA for the use of the EU Data Act Portal

Below, we provide information about the processing of your personal data ("data," "your data") by SEAT / CUPRA and your rights under data protection law, in particular under the General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR").

This privacy notice applies to the processing of your data in connection with the provision of product data and related service data by us in accordance with Articles 4 and 5 of the EU Data Act (Regulation (EU) 2023/2854 ("EU Data Act")) via the platform provided for this purpose ("Data Act Portal").

A. Who is the controller for data processing?

SEAT, S.A.U, (SEAT / CUPRA)
CIF A-28049161, Autovía A-2, Km. 585, Martorell (Barcelona), Spain
customercare@seat.es / customercare@cupraofficial.com

B. Collection, processing, and use of your data

I. What data do we process and from which sources does it originate?

We process your data, which we have generally received from you. The following categories of data are regularly relevant:

- **Private and professional (work) contact and master data**
  - Contact details: name, address, email, telephone number, company
  - Identification data: date/place of birth, gender, identification numbers
- **IT usage data**
  - User and login data: username, roles, authorizations
  - Logging data: technical logs, activity history, login times
  - Software and hardware data: IP address, MAC address, computer name
- **Vehicle master data and vehicle identification**
  - Vehicle identification data: VIN, license plate number, production number
  - Vehicle master data: vehicle specifications such as model, engine power, exterior color
- **Data on vehicle history and workshop visits**
  - Driving status and operation: engine speed, mileage, speed, warning messages
  - Data for warranty and service processing: contract and application data
  - Event memory data: meter readings, event and readiness codes
- **Vehicle usage data (vehicle usage and operating data)**
  - Interior sensors: fatigue and alcohol warning, seat occupancy
  - Environment and driving sensors: pedestrian detection, parking assist, lane departure warning system
  - Online vehicle data: driving status and operating data
  - Online event memory data: meter readings, event and readiness codes
  - Car-2-X data: driving data for communication with other road users
  - Accident data: impact severity, direction of travel
  - Smartphone integration: data transmission between vehicle and smartphone
  - Infotainment and navigation usage data: online traffic information, navigation, charging data
  - Comfort settings: mirror settings, seat heating
  - Location data: position data including time stamp
  - Location history data: position history (movement behavior)

In addition, to the extent necessary for the performance of obligations imposed by law or the authorities, we process data that we have lawfully received from authorities (e.g. on the basis of legal authority, to execute orders, to fulfil contracts or on the basis of consent given by you).

II. Is there an obligation to provide data?

You are generally free to provide your data. In individual cases, there may be legal or contractual obligations to provide certain data, which we will point out to you if necessary. The provision of certain data may also be a prerequisite for the conclusion of a contract or for the initiation, establishment, execution, and termination of your business relationship with us. If you do not provide this data, you may suffer a legal disadvantage under certain circumstances. For example, without being provided with your data, we will generally have to refuse to conclude a contract or execute an order, or we will not be able to perform an existing contract or service.

III. For what purposes and on what legal basis do we process your data?

We inform you about the processing of your data in connection with the provision of product data and related service data via the Data Act Portal. The processing of your data can generally be based on the following legal bases:

- The processing is based on your consent pursuant to Art. 6 (1) (a) GDPR, which you have given us voluntarily and for specific purposes (e.g., your consent to the provision of your vehicle data to a company that has requested your consent as an authorized user of your vehicle within the meaning of the EU Data Act). You have the right to revoke your consent at any time with effect for the future.
- The processing is necessary for compliance with a legal obligation to which SEAT / CUPRA is subject under EU law or the law of an EU Member State, Art. 6 (1) (c) GDPR (e.g. the obligation of SEAT / CUPRA as data holder to make available certain vehicle data and related service data in accordance with Art. 4, 5 EU Data Act, which will apply from 12 September 2025).
- The processing is necessary for the purposes of the legitimate interests pursued by SEAT / CUPRA or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, Art. 6 (1) (f) GDPR (e.g. the legitimate interest of SEAT / CUPRA in processing requests you submit to customer support).

Purpose	***Description / Examples***	***Legal basis under the GDPR***
Use of SEAT / CUPRA ID to log in to the Data Act Portal	Users can log in with their SEAT / CUPRA ID (ID account) by using the email address and password they specified during registration and then giving their consent to share their account information with the Data Act Portal Further information can be found in the privacy notice for SEAT / CUPRA ID, available at https://seatid.vwgroup.io/data-privacy.	Art. 6 (1) (a) GDPR (consent).
Making data available to the user via the Data Act Portal or sharing data with third parties at the user's request	Registering SEAT / CUPRA vehicles by the user in the Data Act Portal. Determination of the scope of the data to be made available by the user (to the user themselves or to a third party designated by the user). Making available of the requested data to the user or a third party designated by the user (in each case at the request of the user).	Art. 6 (1) (c) GDPR in conjunction with Art. 4, 5 EU Data Act (legal obligation); and, with regard to the specific making available of data at the user's request, additionally Art. 6 (1) (a) GDPR (consent).
Enabling the user to give consent to the provision of their data to other users or to enable other users to share their data with third parties	B2B users of a vehicle may submit data access requests under the EU Data Act, which may concern personal data of users registered on the vehicle. The provision of personal data to other users requires a valid legal basis under the GDPR, usually the consent of the data subjects. This consent can be given via the Data Act Portal. Display and recording of the user's consent to the provision of their data to other B2B users within the meaning of the EU Data Act, who	Art. 6 (1) (a) GDPR (consent).

	either wish to receive this data themselves or share it with third parties. Provision of data to B2B users and/or third parties designated by B2B users after consent has been given by the user.	
Managing data sharing requests and consents in the SEAT / CUPRA ID account	Data sharing requests made and consents given within the Data Act Portal can be managed in the SEAT / CUPRA ID account.	Art. 6 (1) (c) GDPR in conjunction with Art. 4, 5 EU Data Act (legal obligation) with regard to data sharing requests made by the user; and Art. 6 (1) (a) GDPR (consent) with regard to consents provided by the user.
Processing of support requests relating to SEAT / CUPRA	Processing of support requests relating to SEAT / CUPRA, which relate, for example, to the making available of certain data for individual SEAT / CUPRA vehicles.	Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of SEAT / CUPRA in processing the request.
Safeguarding and defending our rights or disclosure in the context of official/judicial measures	Exercising and asserting rights and claims. Disclosure in the context of official/judicial measures for the purposes of gathering evidence, criminal prosecution, and enforcement of civil law claims.	Art. 6 (1) (c) GDPR (legal obligation), insofar as processing is necessary to fulfil a legal obligation to which SEAT / CUPRA is subject; otherwise Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of SEAT/CUPRA in asserting and defending its rights and complying with legal and regulatory requirements.
Compliance with legal requirements / Processing based on legal provisions	Archiving based on statutory retention obligations. Processing of data subject requests in accordance with the GDPR. Processing of reports of potential violations of personal data protection.	Art. 6 (1) (c) GDPR (legal obligation), insofar as processing is necessary to fulfil a legal obligation to which SEAT / CUPRA is subject; otherwise Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of SEAT/CUPRA in asserting and defending its rights and complying with legal and regulatory requirements.

IV. Who receives your data?

Within SEAT / CUPRA, only those departments that need your data to fulfil the above-mentioned purposes will have access to it.

Your data will only be transferred to third parties if this is necessary for the aforementioned purposes and there is a legal basis for doing so or you have given your prior consent. If SEAT / CUPRA has commissioned service providers to process data or provide related services, the data will generally be transferred on the basis of a data processing agreement in accordance with Art. 28 GDPR or if there are professional obligations that guarantee a sufficient level of data protection. We select our processors carefully; they process personal data exclusively for the purpose of fulfilling their assignments and are contractually bound to our instructions, have appropriate technical and organizational measures in place to protect personal data, and are regularly monitored by us.

In principle, the following categories of recipients may receive data:

- Service providers/suppliers
  - Hosting service providers
  - Support service providers
  - Consulting companies/service providers
  - Technical development service providers
- Insurance companies
- Government
  - Supervisory authorities
  - Investigative authorities/courts
- Legal, economic, and financial representatives

- Auditing companies/tax advisors
- Lawyers/notaries
- Group companies

V. Will your data be transferred to a third country or to an international organization?

Generally, your data will only be processed within the European Union or the European Economic Area. If processing takes place in third countries (i.e. countries that are neither members of the European Union nor the European Economic Area) for which the European Commission has not determined an adequate level of data protection, e.g., by our sub(processors), we ensure that contractual, technical, and/or organizational measures are taken that are appropriate and necessary to ensure an adequate level of data protection when processing your data. This can be done in particular by concluding so-called EU Standard Contractual Clauses, which you can access here. If processors or sub-processors based in the USA are certified under the EU-US Data Privacy Framework, the EU-US adequacy decision applies, and the USA is considered a safe third country in this respect.

You can obtain a copy of the specific measures we have taken to ensure an adequate level of data protection from us. Please use the contact details provided in section C. II.

VI. How long will your data be stored?

We process and store your data for the purposes stated above as long as necessary. Once the purpose has been fulfilled and there are no retention obligations, the data is generally deleted.

In addition, we are subject to various retention and documentation obligations, which arise from legal provisions. The retention and documentation periods specified therein are up to 10 years for SEAT / CUPRA.

Finally, the storage period is also determined by the statutory limitation periods, which can generally be three years, so that we store the relevant data for up to four years, taking into account the year in which the claim may have arisen.

C. Data protection officer and rights of data subjects

If you have any general questions about this privacy notice or wish to receive further information on the processing of your data by SEAT / CUPRA, you can contact our **data protection officer** by email: mailto:dataprotection@seat.es.

I. What are your rights?

You have the following rights vis-à-vis us, subject to the respective legal requirements:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR).

Right to object

You have the right to object to the processing of your data

- **if the processing is carried out for direct marketing purposes (including profiling for direct marketing purposes) or**
- **if the processing (including profiling) is necessary for the purposes of the legitimate interests pursued by us or by a third party (Art. 6 (1) (f) GDPR) or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Art. 6 (1) (e) GDPR). In the event of such an objection, we ask you to inform us of the reasons for your objection to the processing of your data. In the event of your objection, we will no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.**

Please send your objection and, if necessary, the reasons for it to SEAT / CUPRA using the contact details provided in section C. II.

Furthermore, you have the right to contact a data protection supervisory authority at any time in accordance with Art. 77 GDPR if you believe that the processing of your data violates applicable law. The data protection supervisory authority in Spain is the AEPD www.aepd.es

However, you may also lodge a complaint with any other data protection supervisory authority within or outside the EU, in particular with the supervisory authority in the Member State of your habitual residence, your place of work or the place of the alleged infringement. The contact details of national data protection supervisory authorities in all EU Member States can be found at the following link: https://edpb.europa.eu/about-edpb/board/members_en.

II. Exercising your rights as a data subject

If you wish to exercise your rights as a data subject, please use our email contact channel customercare@seat.es / customercare@cupraofficial.com

III. Exercising your rights under the EU Data Act

The types of data concerned and your rights differ depending on whether the GDPR or the EU Data Act applies. To exercise your rights under the EU Data Act, please use our dedicated Data Act Portal, to which this privacy notice applies and which has been specifically designed to handle EU Data Act requests. Please note that requests regarding data under the EU Data Act cannot be processed via our contact channel for data protection requests listed under C.II.

D. Amendments to country-specific data protection regulations

Please note that the data protection level of GDPR, as described above, represents the baseline requirements. If country-specific data subject rights apply or further information on data processing or contact persons are required, you will find these in the following country-specific additions.

France

To the extent that the access to the data and the data processing fall within the scope of the data protection laws of France, you also have the right to define directives concerning the fate of your personal data after your death (post-mortem right).

Spain

To the extent that access to and processing of data falls within the scope of data protection laws of Spain, please note that your personal data will be deleted after the statutory retention period has expired if the legal basis for processing your personal data no longer applies (in particular if you withdraw your consent), if the processing of your personal data is no longer necessary for the respective purpose or if the purpose itself no longer applies.

Status: September 2025