

# Privacy Notice for Mercedes-Benz Digital Extras and Device Services

Effective: September 17, 2018

## Introduction

When you purchase, lease or are authorized to use a Mercedes-Benz-capable vehicle or device, including a Mercedes-Benz, Freightliner Sprinter Van, or a Mercedes-Benz Wallbox Home, you may become eligible to subscribe to our digital extras and device services, which are collectively named **Mercedes-Benz Digital Extras**. Mercedes-Benz unlocks access to a package of innovative services, products, and lifestyle offers from Mercedes-Benz, Mercedes-Benz AG, and our cooperation partners – including, but not limited to, remote access to vehicles to start and lock/unlock, live navigation assistance, integration of popular mobile apps and emergency services at the push of a button, remote access to vehicle maintenance and status, home charging capabilities, and much more.

At Mercedes-Benz, protecting your privacy is very important to us and we want you to feel comfortable using our connected vehicle and device services. This Privacy Notice explains our practices regarding the collection, use, and sharing of information that is collected, generated, recorded, or stored when you use a vehicle or device equipped with Mercedes-Benz Digital Extras California residents may [click here](#) for specific information regarding our data practices and privacy rights. Other state-specific information may be found [here](#).

When you use a vehicle with Mercedes-Benz Digital Extras and safety and security features, which include automatic collision notification and an emergency call system, we and our service partners collect certain information, including **geolocation information** and **driver behavior information**, as described below. How we use your information will depend on which services you use, how you use those services, and the choices you make in your settings.

*Even if you have not activated Mercedes-Benz Digital Extras, the vehicle may collect and transmit geolocation information and driver behavior information in a collision or potential emergency. See the vehicle's Operator's Manual for more information. Geolocation information may also be accessed without activation of Mercedes-Benz Digital Extras by third-party services providers in accordance with your agreements with them.*

By purchasing or using a vehicle or device equipped with Mercedes-Benz Digital Extras, using Mercedes-Benz Digital Extras, subscribing to Mercedes-Benz Digital Extras, making a purchase through Mercedes-Benz Digital Extras, or creating a Mercedes-Benz account, you consent to the practices described in this notice.

*This Privacy Notice does **not** address the collection, use, or sharing of information regarding how you use or interact with our websites and mobile applications. Please see our [website privacy statement or Mercedes-Benz Application Terms of Use & Privacy Policy](#) for information related to those services.*

## What We Collect

- **Driver Behavior Information**: Information about how you drive the vehicle, such as vehicle speed, seat belt use, acceleration, trip duration, and braking habits.
- **Geolocation Information**: Information about the precise geographic location of the vehicle.
- **Account Information**: Information that you may provide when you subscribe to, register for, or use Mercedes-Benz, such as name, address, payment information, tax exempt status, telephone number, email address, and date of birth.
- **Vehicle Data**: Data about your vehicle, including data generated by the sensors and software in your vehicle, such as diagnostic trouble codes, maintenance conditions, engine performance, system temperatures, mileage, tire pressure, fuel level, door and window status, sensor status, climate control settings, charging status, charger type, battery status, impact data, and fuel economy. Vehicle data may include your vehicle's VIN, Driver Behavior Information and Geolocation Information. Vehicle Data may also include voice recordings made to support voice-activated services, and images taken of vehicle surroundings when requested by the operator.
- **System Information**: Information about how you interact with vehicle or device, including use of multimedia screens, recent service requests, purchases, presets, and charging settings.
- **Service-Related Information**: Information related to the availability, use of, or access to services and features, including charging station information, your chosen routes, calendar entries, contact numbers, points of interest, eligibility for services, available parking spaces, information requests, traffic information, hazard information, service activation requests, and credentials for multimedia services. We may also collect information including your address book, calendar, tasks, and emails, to the extent you authorize such collection.

We may collect the above information at regular intervals while the vehicle or device is in use.

## How We Use the Information We Collect

We are committed to using the information we collect only in ways that are consistent with the context in which we collected the information and consistent with the choices that you make. We may anonymize or aggregate information we collect so that it does not reasonably identify you or your vehicle or device and use or share it for any purpose. We may use the information we collect to:

- Provide the Mercedes-Benz Digital Extras
- Communicate with you regarding Mercedes-Benz Digital Extras
- Remotely diagnose the vehicle or device
- Provide emergency response services
- Provide navigation services and help you find destinations that you are looking for
- Facilitate purchases you make
- Confirm vehicle or device quality

- Help you manage vehicle or device service and maintenance
- Activate remote services
- Improve vehicle or device safety
- Develop new and better vehicles or devices
- Improve our Mercedes-Benz Digital Extras and other services
- Analyze vehicle or device trends
- Conduct surveys and marketing, including interest-based marketing and advertising for us and on behalf of third parties (subject to any required consents)
- Learn how you and others interact with the vehicle or device and its systems
- Protect our, and our affiliates', rights or business interests

We may also use the information we collect consistent with your authorization or consent.

***Geolocation Information:*** We may use Geolocation Information for the purposes disclosed above. In addition, some Mercedes-Benz Digital Extras are primarily location-based. Live Traffic, Navigation, Concierge, Car-to-X communications, Assist Services, Parked Vehicle Locator, Vehicle Tracker, Geofencing, Route Planning, Mercedes-Benz Apps, and Product Improvement services, for example, involve the collection of Geolocation Information to determine the location of the vehicle.

***Driving Behavior Information:*** We may use Driving Behavior Information for the general purposes described above. In addition, some specific Mercedes-Benz Digital Extras may involve the collection and use of Driving Behavior Information.

## **Information Sharing**

In order to provide you with Mercedes-Benz Digital Extras, we may disclose your information to:

- Emergency and roadside assistance providers (e.g., roadside assistance and 911 emergency response)
- Third-party service providers. Examples include,
  - Business partners that may provide you with services (e.g., Satellite Radio, Concierge Services, In-Vehicle Office Services, Parking or Fueling Service Providers)
  - Businesses that provide services on our behalf, such as data storage, analytics, communications, or charging
  - Your Mercedes-Benz dealer (e.g., to inform them that you have activated the services)
  - Our parent company Mercedes-Benz AG and our affiliates, including but not limited to Mercedes-Benz Financial Services, which will use the information subject to their own privacy statements, which may include maintaining and administering agreements with you or providing you with services, including financial services.
- Owner(s) of the vehicle or device you are using
- Law enforcement, if you have requested Stolen Vehicle Location Assistance service (subject to availability)

We share information with third-party content providers to provide you with the information or services you request. For example, we may share information with a third party service provider to process orders, deposits, or payments when you make a purchase through the Mercedes me

connect Store. We may also share information that does not reasonably identify you or your vehicle with third parties that provide traffic or other location-based information or services. Note that information you provide to third parties will be subject to those third parties' privacy statements.

We may share the information we collect consistent with your authorization or consent, such as when you activate third-party services. You should confirm that you are legally authorized to share information with us, including business communication information, before doing so. This applies in particular to persons who are subject to professional confidentiality requirements.

Please note that certain services may involve the sharing of information, including Geolocation Information and Driving Behavior Information, with other authorized users of Mercedes-Benz Digital Extras associated with the vehicle (e.g., household members or fleet owners). For example, authorized users can view Geolocation and Driving Behavior Information when Tracking Services and Vehicle Monitoring are active. Please review applicable service descriptions for more information.

Personal profiles established by your user account may be available to other vehicle or device users. To delete profiles from the vehicle or device, you may need to delete the profile within the Mercedes-Benz Portal as well as within the vehicle or on device.

Additionally, we may also disclose your information to comply with the law; in association with governmental programs (such as safety, tax, or environmental protection); to respond to claims; to comply with legal process served on MBUSA or our affiliates (e.g., a lawful subpoena, warrant, or court order); to enforce or apply our policies or agreements (including to bill and collect payments); to protect and defend our rights or property or that of Mercedes-Benz AG, our affiliates, dealers, customers, employees, visitors, or the public; in connection with a business transfer, sale, liquidation, or merger; and if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure.

We may also provide aggregated data about our Mercedes-Benz subscribers and related telematics service information to third parties but these statistics will not include information that can reasonably identify you or the vehicle or device.

*Geolocation Information:* We may share Geolocation Information to support location-based services, such as Live Traffic, Navigation, Tracking, Concierge, Car-to-X communications, Vehicle Monitoring, Assist Services, and Product Improvement services. When you sign up for these or other services, you may receive additional information about how we share Geolocation Information in association with the specific services. *Geolocation information may also be accessed by third-party services providers in accordance with your agreements with them.*

*Driving Behavior Information:* We may share Driving Behavior Information to support the provision of services, such as Tracking Services, Vehicle Monitoring, and Product Improvement services. When you sign up for these services, you may receive additional information about how we share Driving Behavior Information in association with the specific services.

## Your Choices

### Opt Out of data collection

You may be able to opt out of the collection of data via certain Mercedes-Benz Digital Extras by deactivating those specific services through the Mercedes-Benz portal. Please note opt out and deactivation rights may be limited to vehicle or device owners, lessees, or their designees. Contact Mercedes-Benz Support for additional information on how to opt out of data collection or deactivating services: 1 (800) 367-6372 or [me-connect.usa@cac.mercedes-benz.com](mailto:me-connect.usa@cac.mercedes-benz.com).

### Review and Update

You may request to review and update your personal information at any time by emailing [myprivacy@mbusa.com](mailto:myprivacy@mbusa.com).

### Deletion of Data

You can delete Geolocation Information used for Parked Vehicle Locator, Vehicle Tracker, Geofencing, Last Mile Navigation, Trip Statistics, Valet Protect, Curfew Minder and Speed Alert by deactivating the services, to the extent these services are offered on your vehicle. To deactivate certain location-based services, you may need to contact the Customer Assistance Center without using your vehicle's communications features. This prevents unauthorized disabling of location services. Please note deletion and deactivation rights may be limited to vehicle owners, lessees, or their designees.

### Security and Data Storage

We endeavor to protect the data we collect. We use commercially reasonable physical, technical, and administrative security measures designed to protect information against loss and unauthorized access or use. Please note, however, that no information system is 100% secure and we cannot guarantee the security of your information. We retain the information we collect for as long as reasonably necessary to provide services and fulfill the purposes described in this Notice, after which point such information may be deleted or de-identified.

### Changes to this Notice

We may amend or update this Notice from time to time. In such event, we will post the revised Privacy Notice at this location. In some circumstances, we may take reasonable steps to alert vehicle or device owners and registered users prior to the change.

### Contact Us

If you have any questions or comments about the privacy practices described in this Notice, please contact us at: [myprivacy@mbusa.com](mailto:myprivacy@mbusa.com)

Last Updated: August 23,2024