



**BMW Group Privacy
Corporate Rules.**

DATA PRIVACY.

**BMW
GROUP**



Rolls-Royce
Motor Cars Limited

DATA PRIVACY HAS MANY FACES.



**Dear employees
of the BMW Group,**

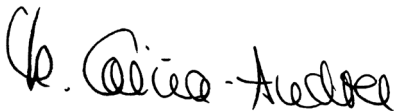
As a global company the security and the development of our competitiveness is one of our important goals. The excellence of our products and services is significantly influenced by our innovative strength. Through these, we distinguish ourselves from our competitors. Through these, we continue to be Number ONE.

Our responsibility for the correct handling of personal data is as important as the security of our own infor-

mation. It is with this correspondingly awareness of personal data protection, that we comply not just with legal requirements. We create trust – in our employees, customers and partners, across all borders.

With the BMW Group Privacy Corporate Rules there are for the first time uniform, Group wide principles for data Privacy. The application of these Rules ensures a high global standard for protecting the privacy of every individual.

This brochure summarizes the most important rules for employees of the BMW Group.

A handwritten signature in black ink, reading "M. Caiña - Andree". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Milagros Caiña Carreiro-Andree,
Member of the Board of BMW AG,
Human Resources and Social Care

DOS & DON'TS



Do provide the person with the reasons for collection.

Explain the purpose the information will be used for.



Don't forget to ask for permission!

Remember that people have the right to choose not to disclose personal information if not directly necessary, so get their consent.



Don't stockpile personal information.

Only collect and store data for a certain purpose which you are clear about from the beginning – not for potential future needs or “just in case”.

PURPOSE

Only relevant personal data is collected and not more than needed; typically consent is required.

Remember:

No more than absolutely necessary.



The golden rule for collecting and holding personal data: “no more than absolutely necessary”. Whether you deal with large or small amounts of personal data, you should only acquire it to serve a

specific and clear purpose. It is important to ask for consent in particular if you are asking for additional or sensitive information.

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DOS & DON'TS



Do tell people about their rights.

Inform everyone you collect personal data from, what their rights are.



Don't record information that is not necessary.

You will need to provide all personal information if requested, so don't keep information that is not entirely necessary or you would not want to give later.



Do respect people's right to privacy.

Remember that people have the right to see the information obtained about them, and to correct, delete it or ask you to stop using it.



Do always know where personal data is stored.

Create an effective system that allows you to easily find where specific personal data is stored, either on paper or digitally.

RIGHTS

Individuals have the right to know what information is held about them and are allowed to correct any inaccuracies.



People have many rights when it comes to their personal data – after all, it's **their** personal information. It's your job to correctly inform customers

and employees about their rights which are:

- Know what you're collecting about them, where you got it from, and what it's being used for.
- Know who can access and use their personal data including other companies.
- Update or correct it at any time.
- Request for their personal information to be deleted, partially or in full.
- Request that their personal data is no longer used by you.

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DOS & DON'TS



Do get people to verify their information.

Find simple ways for people to review and correct the personal data you hold.



Don't use old data before double checking it's correct.

Before using data that you collected long ago or that was not recently verified, check its accuracy.



Do establish methods for regularly updating and correcting data.

Set up clear, consistent ways to manage data you've collected.



Don't store data once it has served its purpose.

Once you don't need it, you should archive or delete it as soon as it's served its purpose.

INTEGRITY AND DATA QUALITY

Personal data is accurate and only kept as long as required.



As people and their lives change so, too, does their personal data.

That's why it's essential for personal data you've

collected to be regularly reviewed and corrected.

This way, you know the data you're using is accurate and up-to-date. When you don't need it any more, you should archive or delete it.

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DOS & DON'TS



Don't use data for a purpose other than what you obtained it for.

When you want to use personal data, check that you've obtained the required permissions to do so.



Do ask people for permission if you intend to use their personal data for additional purposes.

When you may be thinking of new ways to use personal data always consider if it is reasonable to the permissions given when collected.



Don't do anything that could jeopardize a person's loyalty to or trust in the BMW Group.

Always respect the valid usage of personal data you obtain. Remember that the reputation of the BMW Group is extremely important.

VALID USAGE

Personal data is used as communicated and within the individual's reasonable expectations.



When collecting data from people, you must tell them what it'll be used for and then you must make sure it is only used

this way. This is known as “valid usage”.

No matter the circumstances, if you'd like to use the data for different or new purposes, you must inform people about it and ask for their consent. Failing to do so could cause people to lose trust in the BMW Group.

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DOS & DON'TS



Do know with whom you may be sharing people's personal information.

When making arrangements with other companies for services make sure you know all the third parties involved and where the data may be going.



Do act within the laws and regulations.

Confirm which data privacy laws apply to the data you are transferring.



Do verify the security standards at other companies.

All parties with access to personal data must have as high levels of security as the BMW Group.



Don't forget that you may need additional agreements or contracts.

Transfers to companies based in other countries especially may require additional precautions.

ADEQUACY

Personal data is adequately protected when sent to others.



If you are sending or sharing data with other companies, whether a BMW Group Company or External Supplier, you need to make sure that personal information is secured

to the same high level as laws and regulations on companies vary around the world.

If you are transferring data across borders, there are complex cross-border rules to consider so you may need to do extra due diligence. This includes detailed contracts and checks of the supplier security arrangement.

When in doubt, check with your local or regional DPPO.

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DOS & DON'TS



Do store personal data safely and securely.

Proper security measures help ensure the personal data you've collected stays safe.



Don't stop at IT security.

Management and organisational security are equally important in protecting personal data e.g. training, awareness and policies/procedures on good data handling.



Do enlist the help of a DPPO.

They can assist you in setting up the necessary data privacy measures – even cross-departmental.



Don't reveal personal data in public.

Openly reading personal data on a flight or while commuting puts confidentiality at high risk. Don't take work related personal data home with you.

CONFIDENTIALITY

Personal data is protected from unauthorized or accidental disclosure.



You must keep personal data safe and secure, protecting it from potential misuse, theft, or loss. Treat another person's information with as much care as you would want your own data handled.

General tips to bear in mind:

- Have a DPPO assist in setting up appropriate measures.
- Attend regular trainings on privacy topics.
- Share good privacy practices with colleagues.
- Correctly dispose of old (IT) equipment and documents containing personal data.
- Limit access to personal information and encrypt sensitive data.
- Use strong passwords.
- Avoid speaking about personal data in public places.

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DOS & DON'TS



Do inform people in easy-to-understand language about how their data will be used.

Provide people with a Privacy Notice that uses simple, clear words to explain the purpose.



Don't forget an opt-in or opt-out.

Allow people to make an informed decision about how their personal data will be used by ticking the opt-in or opt-out box where appropriate.



Do refer to the Privacy Policy for more information.

Give people the opportunity to read the BMW Group Privacy Policy or your local Privacy Policy.



Do check the other Rules!

Go back and check whether the Rules of "Purpose" and "Valid Usage" and "Rights" are followed.

TRANSPARENCY

We will explain to individuals how their personal data will be used.

Give a proper notice



When you collect data, it's important to provide a clear, transparent and comprehensive Privacy Notice, written in a way that everyone understands.

There is no need to go into every last detail – but it should contain any intended uses that are out of a normal, expected scope.

Make sure to also have the BMW Group Privacy Corporate Rules at hand when collecting people's personal data.

The Privacy Corporate Rules work together to ensure a person's Privacy is respected!

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A COMPREHENSIVE PRIVACY NOTICE INCLUDES...

- Clear information about the intended purpose.
- The scope in which the personal data will be used.
- The name of the company (data controller) who is collecting the information.
- A contact address if there are questions or concerns about data usage.
- Any consequences associated with the terms of use.
- An opt-in or opt-out when necessary.
- Information about the person's right to access and to correct personal data.
- Where to read the full Privacy Policy.



This is a summary of the BMW Group Privacy Corporate Rules.
Please find the complete version online at [**http://privacy.bmwgroup.net**](http://privacy.bmwgroup.net)

BMW Group

Konzerndatenschutz / Group Data Privacy Protection

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