



At Jaguar Land Rover North America, LLC and Jaguar Land Rover Limited (collectively referred to as “JLR”, “our”, or “we”), we respect and are committed to protecting your privacy.

For your convenience, we present below important highlights of the Privacy Policy for Jaguar InControl™ services, which, as described below, is a location-based service. Please read the Highlights and the complete Privacy Policy carefully to understand how we will treat your personal information and other data.

### PRIVACY POLICY HIGHLIGHTS

This Highlights section contains an overview of key points relating to your use of the Jaguar InControl™ Services (as defined in the Privacy Policy), certain connectivity elements of your InControl Services, My Jaguar InControl website, and InControl Remote Smartphone App, all of which are described in the full policy available in the Privacy Policy section of the My Jaguar InControl website at <http://www.jaguarincontrol.com/owner/>. As described below and in the Privacy Policy, even if you decline acceptance of InControl Services, certain connectivity and functions may continue and be triggered in the event of an emergency.

**Information We Collect** - We collect various information (“**Covered Information**,” as defined in the Policy) about you and your InControl-equipped Jaguar vehicle, including:

- information relating to your purchase or lease of your InControl-equipped Jaguar vehicle;
- information about your communications with us, requests made via the My Jaguar InControl website or Remote Smartphone App, and how you access and use the My Jaguar InControl website or Remote Smartphone App (including device-related information);
- information about your vehicle, including its make, model, model year, features, registration number, Vehicle Identification Number, date of purchase or lease and vehicle status;
- **location information and information about how you drive your Vehicle:** Unless you cancel your InControl Services, we will collect your vehicle’s last-parked location. When the “Journey Tracking” function is activated, we collect the location of your vehicle, average speed, and other information. The full Policy describes how you can turn off the “Journey Tracking” function. But certain events, such as emergency calls which can be automatically triggered by an accident, the deployment of airbags, or manually made, may automatically activate collection of location information even when the “Journey Tracking” function is turned off or if you have declined acceptance of InControl Services. Depending upon the location settings of your mobile device, which you can control, the InControl Remote Smartphone App may collect information about your mobile device’s location, but this information is not transmitted to us. The location information is processed on your device;
- by using cookies and other technologies to track your interactions with our online services and personalize your experience;
- information from your registration/subscription for and use of connectivity services relating to your InControl

Services, including any Trial Plan and/or Data Plan;

- information about you and your vehicle from publicly or commercially available sources.

**How We Use Information** - We use Covered Information:

- to provide you with the InControl Services you have requested and to improve and troubleshoot those services;
- to communicate with you about your account or vehicle, learn about you, and resolve disputes;
- for research or product development;
- for safety, operations, compliance and/or warranty purposes;
- to improve, maintain, and troubleshoot InControl Services and provide diagnostics and service information for your vehicle; and
- to provide you with offers that may be of interest to you.

**Sharing Information** – We share Covered Information:

- with third-parties, including service providers, that process information on our behalf, and to provide you with InControl Services;
- with our corporate affiliates and authorized Jaguar retailers;
- to facilitate a transfer of a business or related assets; when there is a legal obligation to disclose your information; or to protect our legal rights, the public, or others;
- to protect the rights and interests of Jaguar, its employees, vehicle owners, and individuals who may use or ride in Jaguar vehicles
- in a de-identified manner for various purposes; and
- with our trusted business partners and other third-parties to provide you with information about offers, goods and services

**Your Choices-**

By checking the box indicating you have read this Privacy Policy, you are providing us with consent to process, use and distribute your Covered Information in accordance with the terms of this Privacy Policy. You may update your account profile via the My Jaguar InControl website, and change certain election(s) relating to our use of your Covered Information at any time.

If we use your Covered Information to provide you with marketing communications from us or others, we may

make certain options available regarding those communications via the My Jaguar InControl website or other appropriate channels (such as the communication itself).

You can learn about your ability to register your do not track preferences in the “Do Not Track Preferences” section of the full Policy.

#### **Other Information**

We use reasonable security measures to protect your Covered Information.

We and our service providers may collect, transfer, store and process your information outside of your country of residence.

We are not responsible for any third-party products or services you access via the InControl Package.

We will post updates to the InControl Privacy Policy in the Privacy Policy section of the My Jaguar InControl website. If we make a change to the Privacy Policy that requires your consent, you will be required to view such change on the My Jaguar InControl website and choose whether to accept (or reject, if applicable) the change or terminate your InControl Services.

#### **How to Contact Us**

For information about this Privacy Policy or our privacy practices, email us at: [incontrolprivacy@jaguarlandrover.com](mailto:incontrolprivacy@jaguarlandrover.com), call us at **800 – 452 – 4827**, or send your correspondence to:

Jaguar Land Rover North America, LLC  
100 Jaguar Land Rover Way  
Mahwah, New Jersey 07495-1100  
Attn: Customer Care – Privacy Issues

### **InControl Package Privacy Policy Last updated: 23 September 2018**

This Privacy Policy lets you know how and for what purposes your personal information and other data is being collected, processed, and used in association with your vehicle’s InControl Package.

#### **SCOPE OF POLICY**

This Policy applies to your use of:

- any of the following “InControl” services (depending on your Vehicle model and subscription): (i) the services provided via the InControl Remote Smartphone App and the My Jaguar InControl website; (ii) the “SOS Emergency Call” services (including the InControl Connectivity Services); (iii) the “Optimised Jaguar Assistance” services (including the InControl Connectivity Services); (iv) “Stolen Vehicle Locator” services

(including the InControl Connectivity Services); (v) InControl Pro Features; and (v) the “Live” functionality (“**InControl Services**”).

- the website from which you can access your InControl Services account and access certain InControl Services (“**My Jaguar InControl website**”); and
- the mobile phone application (“**InControl Remote Smartphone App**”) that you may download onto your mobile telephone and which enables you to use the “Remote” features;
- the 3G network connectivity, which allows you to use the Live Features and Wi-Fi Hotspot functionalities, provided to your Vehicle by a Network Provider, if applicable depending on your Vehicle’s make, model and specifications, limited to the **lesser** of three (3) gigabytes or three (3) months of data usage, whichever comes first (“**Trial Plan**”); Note: should you decide to subscribe to the Wi-Fi Hotspot services of a Network Provider, the privacy policy and terms of that Network Provider will apply upon your subscription to that service.
- the transmission of data, SMS, and Voice by the Network Provider to and from the installed and activated Telematics SIM in the Vehicle in relation to the “SOS Emergency Call” service, the “Optimised Jaguar Assistance” service, the “Stolen Vehicle Locator” service or the services provided via the InControl Remote Smartphone App, and also, depending on your Vehicle’s model and subscription, the transmission of data, SMS and Voice by the Network Provider to and from the installed and activated Personal SIM in the Vehicle in relation to any InControl Pro Features in your Vehicle (“**InControl Connectivity Services**”).

Words and phrases used in this policy have the same meanings defined in our InControl Terms and Conditions as set out on the My Jaguar InControl website unless otherwise indicated. “**InControl Package**” as used herein shall mean, as applicable based on your Vehicle’s model and subscription(s), the InControl Services, the My Jaguar InControl website, the InControl Remote Smartphone App, and your Vehicle’s Wi-Fi Hotspot functionality (including the Trial Plan).

**Please note that, as described in more detail below in the discussions of information we may collect, certain services and connectivity between your Vehicle and us may continue even if you decline to accept InControl Services.**

This Privacy Policy is not applicable to any other websites or mobile applications offered by Jaguar Land Rover Limited, Jaguar Land Rover North America, LLC or any of our affiliated entities; any third-party web pages, mobile applications, or social media sites (including those offered by franchised dealerships or service centers); or any e-mail lists, non-user-specific information, or personal information collected or owned by any entity other than JLR. For information about the privacy practices applicable to third-party resources or other websites or mobile applications, please consult the applicable privacy policies governing such third-party resources, websites and/or applications.

This Privacy Policy does not apply to information collected by JLR through a means other than the InControl Package.

Please note that as stated in the InControl Terms and Conditions, you are required to alert all passengers and people you authorize to use your Vehicle or the InControl Package (“**Authorized Users**”) about the privacy

practices disclosed in this Privacy Policy related to our collection, use and disclosure of personal information and other data as disclosed in this policy. For clarity, the term 'you' as used in this Privacy Policy includes any Authorized User(s).

Please also note that your (and your Authorized Users') use of the Trial Plan and InControl Pro Features is subject to your acceptance of the privacy policy of AT&T Mobility LLC, which can be found here (<http://www.att.com/privacy>). As of the date of this Privacy Policy, AT&T Mobility LLC is the Network Provider for the InControl Pro Features and Wi-Fi Hotspot (including the Trial Plan), and the AT&T privacy policy will control the collection, use, and disclosure of data by the Trial Plan, and (if you decide to subscribe to the services) the InControl Pro Features and Wi-Fi Hotspot.

## **INFORMATION WE MAY COLLECT ABOUT YOU**

We may collect and process the following data about you and/or your Vehicle ("**Covered Information**"):

- **Submitted Information:** information that you or the authorized Jaguar retailer from which you purchased or leased your Vehicle provide during the setup of your InControl Package account(s). This information includes, but is not limited to, your name, address, telephone number (including mobile number), e-mail address, language preference, password and PINs for your InControl Services account, and your preferred authorized Jaguar retailer.
- **Transaction and Communication Records:**
  - if you contact us, we may keep a record of that correspondence; and
  - details of any, uses, navigation history, or transactions (if applicable) you carry out through the My Jaguar InControl website, Live Features, and/or the InControl Remote Smartphone App.
- **Device Information (including location):** We may collect information about the mobile device, tablet (or similar), or any computer you may use (each a "**Device**") to access or download a copy of the InControl Remote Smartphone App onto your Device, including the operating system and version, the InControl Remote Smartphone App installation unique identifier, and the Device's locale settings and country code. The InControl Remote Smartphone App may also collect information about the accelerometer and location of your device, and identification information such as tokens or usernames. You can restrict the access to, or collection of, your Device's location by disabling the location features of your Device or by not using the features of the device that require location information.
- **Vehicle Identification Information:** information about the vehicle on which you have a current and valid subscription for the InControl Services ("**Vehicle**") including the Vehicle Identification Number ("**VIN**"), make, model, model year, Vehicle features, registration number, date of purchase or lease, and the authorized Jaguar retailer from which you purchased or leased the Vehicle.
- **Vehicle Location Information:** information about the last parked location of the Vehicle, which will always be collected for availability through the Remote Smartphone App and the My Jaguar InControl

website unless you cancel your InControl Services by the method(s) described in the InControl Terms and Conditions. We will also collect and process information about the location of the Vehicle at any point in time as part of the "Journey Tracking" function ("**Journeys**") of the InControl Services (when Journeys is activated). The information that we will collect and process as part of Journeys is set out in "Journey Information" below. You are able to switch off Journeys via the My Jaguar InControl website or the InControl Remote Smartphone App. If, however, the "SOS Emergency Call", the "Optimized Jaguar Assistance", or "Stolen Vehicle Locator" function is activated, real-time location data relating to the Vehicle will be sent to the relevant service providers and/or emergency services (as appropriate) even if you have not activated Journeys or switched off Journeys. Please note that the "SOS Emergency Call" functions will be activated automatically upon the occurrence of a relevant trigger event such as the deployment of your vehicle's airbags respectively. Please also note that even if you decline acceptance of InControl Services, certain limited connectivity between your Vehicle and us and/or our emergency service providers will continue, which may be triggered in the event of an emergency. Specifically, if vehicle sensors detect that an accident may have occurred, including through a trigger such as deployment of the Vehicle's airbags, the Vehicle may automatically initiate a call to contact emergency services via activation of the "SOS Emergency Call" function or you may be able to manually initiate a Voice call for emergency services. The occurrence of such call may transmit information, including Vehicle location, time, and a vehicle identifier to us and/or our emergency service providers. For full details of the relevant trigger events please refer to the Vehicle handbook.

- **Information about How You Drive Your Vehicle - "Journey Information"**: information about your journey is sent from your Vehicle, including the journey date and distance, the duration of the journey (start date/time and end date/time), the average speed, the distance, the route travelled and data about the Vehicle's fuel efficiency. You can turn off Journeys via the My Jaguar InControl website or the InControl Remote Smartphone App. This will prevent any of the above information from being sent from the Vehicle (except for the last parked location).
- **Vehicle Operation Information**: this includes information relating to the Vehicle's operation by a driver, such as: breaking, speed, lateral acceleration, involvement in an accident, deployment of safety devices (such as airbags), or activation of various Vehicle sensors. We may also collect information about the operation of the Vehicle including, but not limited to, the fuel level, the estimated distance to empty, the odometer value, the distance to recommended service status, the coolant level, the washer fluid level, the brake fluid status, the brake pad wear, tire pressure, tire pressure sensor failure, engine malfunction, oil level, door and window status, trunk open, hood open status, battery information including voltage, emissions information, vehicle-to-vehicle sensor data or communications, and whether the alarm is armed or sounding.
- **Log information**: For the purpose of this Privacy Policy, "**Log Information**" refers to the log files listing actions or requests made to our systems in connection with your usage of the InControl Package. We will automatically collect and store information related to "SOS Emergency Call" and "Optimised Jaguar Assistance" calls made from the Vehicle as well as information related to calls made to our stolen vehicle-tracking provider (including the date, time duration, content of the call and

number of calls made) (“**Call Log Information**”), use made of this data is detailed below. When you access the My Jaguar InControl website we may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps (“**Website Log Information**”). We may also collect and store information related to your usage of the InControl Remote Smartphone App services and vehicle status messages sent by your Vehicle to the InControl Remote Smartphone App (“**App Log Information**”). Please also see the Cookies section below. We may associate some of the Call Log(s) Information with Submitted Information and will treat the combined information as personal data in accordance with this policy for as long as it is combined. This information will only be combined for delivering our InControl Services to you and for fault diagnostics.

- **Security Authentication:** Vehicle identification data and authentication tokens.
- **“Live” information:** app specific information such as favourites, emails, notes, media, and information you choose to submit to the Live Features you use; content feed usage-related information; user settings such as activation of ‘remember me’ function; security authentication data; localisation information such as time zone, language and country; Vehicle make and brand; relevant Log Information.

We may also collect information about you from public or commercial sources, which shall not be considered Covered Information hereunder.

We may combine any of the above described Covered Information together with any information collected from public and/or commercial sources, and will treat the combined information as Covered Information in accordance with this policy for as long as it is combined.

## **ACCESS TO LOCATION AND VEHICLE INFORMATION**

Please note that users of the InControl Remote Smartphone App and My Jaguar InControl website may be able to view the location or status of the Vehicle when it is in use by others. It is therefore important for you: (i) to secure the password, PINs, and other credentials used to access your account; and (ii) to alert all Authorized Users about the privacy practices disclosed in this Privacy Policy and ensure that they consent to our collection, use and disclosure of personal information and other data as disclosed in this policy. In response to a legal obligation or as necessary to protect our rights or property or the safety of you or others, JLR may view or disclose the last parked location of the Vehicle or, when Journeys is active, view or disclose the real-time location of your vehicle while it is in use.

## **PERSONALIZATION TECHNOLOGIES**

When you visit the My Jaguar InControl website, we may collect certain anonymous information for various purposes, such as learning about how users interact with or come to the My Jaguar InControl website, when you visit the My Jaguar InControl website. Such information may include click stream information, browser type, time and date, and content clicked or scrolled over. We typically use a cookie or Web Beacon to collect this

information, as described above. Through these technologies, we may have access to and use non-personalized information about your online usage activity.

### **My Jaguar InControl website - Cookies**

The My Jaguar InControl website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good, tailored experience when you use the InControl Services and to improve the InControl Services. We may also use cookies to identify and keep track of, among other things, those areas of the My Jaguar InControl website and other websites that you have visited (including websites not operated by JLR) to enhance your next visit to the My Jaguar InControl website.

A cookie is a text-only string of information that a website transfers to the cookie file associated with the browser that you use to access the website. Cookies can help a website to arrange content to match your preferred interests more quickly - most major websites use cookies. Cookies alone cannot be used to identify you.

You can choose whether to accept cookies by changing the settings of your Internet browser, but some functionality of the My Jaguar InControl website may be impaired or not function as intended. See the Do Not Track Preferences section below for more information on how to register your preferences regarding the use of cookies.

Two types of cookies are used on the My Jaguar InControl website:

1. Session Cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site.
2. Persistent Cookies, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Session Cookies are used:

- So that you do not have to re-enter information when you visit different pages on the My Jaguar InControl website.
- Within registration to allow you to access stored information.

Persistent Cookies are used:

- To help us recognize you as a unique visitor when you visit the My Jaguar InControl website.
- To allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same ads repeatedly.
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website.

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the service if cookies are disabled.

Below is a list of the main cookies we use, and what we use them for.

Cookie name	Cookie type	Cookie purpose
JSESSIONID	Session	Within a session of your use of the website, this cookie temporarily stores information you have entered to allow some features of the website to work as you move between pages.
cookieInfoShown	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.
jlr-remember-me	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores a token for your identification.
jlr-remember-me-login-name	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores your username for identification.
jlr-selected-locale	Persistent	This cookie stores what language you prefer to view the portal in.
Google Analytics	Persistent	We use Google Analytics to compile anonymous, aggregated statistics that allow us to understand how users use our website and to help us improve the structure of our website. This data does not identify you personally. Please see <a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a> and <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> for further information.

You may delete and block all cookies from the My Jaguar InControl website by activating the setting on your browser that allows you to refuse the setting of all or some cookies. If you use your browser settings to block cookies you may find that, some elements of our website may not work correctly.

### **InControl Remote Smartphone App - Cookies**

To provide the InControl Services or the functionality of the InControl Remote Smartphone App, the InControl Remote Smartphone App temporarily stores or “caches” some of your submitted information (although please note that your password is never cached and that your PIN is only cached when you are using the remote climate

feature), your vehicle identification information, certain vehicle operation information and data related to your use of the InControl Remote Smartphone App features. The cached data, with the exception of the PIN (when using remote climate features), is stored on your device. All cached data will be wiped when you sign out of the InControl Remote Smartphone App.

### **Google Analytics**

We use Google Analytics on the InControl Remote Smartphone App and website to compile, aggregated statistics that allow us to understand how our customers use the InControl Remote Smartphone App and website and to help us improve it. This data does not identify you personally. Please see [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners) for further information.

You may choose to disable Google Analytics on the InControl Remote Smartphone App via your account settings.

### **WEB BEACONS**

Some of the pages on the My Jaguar InControl website and electronic communications associated with InControl may contain images, which may or may not be visible to you, known as Web Beacons (sometimes referred to as “clear gifs”). Web Beacons collect only limited information that includes a cookie number; time and date of a page view; and a description of the page on which the Web Beacon resides. These Web Beacons do not personally identify you and are only used to track usage of the My Jaguar InControl website and activities associated with the My Jaguar InControl website or communications. See the Do Not Track Preferences section below.

### **DO NOT TRACK PREFERENCES**

Except as described in this Policy, we do not allow third-parties to collect information about your activities on the My Jaguar InControl website.

You can opt-out of the collection described above by configuring your web browser (Chrome, Firefox, Internet Explorer, Safari, etc.) to delete and/or control the use of cookies. More information about Do Not Track can be found in the Help system of your browser or at <http://allaboutdnt.com/>.

Note: If you opt-out of tracking by configuring your web browser as described above, you should not delete your cookies. If you delete your cookies, you will need to opt-out again.

We do not otherwise respond to browser ‘do not track’ signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate; if we do so in the future, we will describe how we do so here. Again, see <http://allaboutdnt.com/> for more information.

### **USES MADE OF THE INFORMATION**

We use the Covered Information we collect in the following ways:

- **Submitted Information:** This information is processed to set up your InControl Package account(s) and to send you information about the InControl Services (for example, information about any updates to the InControl Services or the InControl Remote Smartphone App).
- **Transaction and Communication Records:** This information is processed to help to resolve any issues with the InControl Package; to help resolve disputes connected with the InControl Package; to improve our customer service; and to manage your transactions via the My Jaguar InControl website, Live Features and/or the InControl Remote Smartphone App;
- **InControl Touch Pro Features and Software Updates:** We may use data (such as VIN) to record preference choices, to support with our provision of Software Updates, and to deal with queries and any necessary business requirements in connection with provision of Software Updates.
- **Customer Service Calls:** We may record calls with you for training purposes and to help resolve issues.
- **Device Information:** This information is automatically processed to protect your vehicle, provide you with the best service, and to support issue resolution.
- **Vehicle Identification Information, Location Information, Journey Information, Vehicle Operation Information:**
  - This information is processed to provide available vehicle and the InControl Services to you (including but not limited to Software Updates), and to maintain and improve the quality of our vehicles, vehicle services, the InControl Services, and to improve our customer service. We will also use this information to assist in resolving any technical issues with the InControl Services and to enhance your experience of the InControl Services.
  - We will use the Vehicle Operation Information to aid in diagnostics and servicing in relation to the Vehicle and this may include sending you notifications by email or SMS or similar communication technology, unless you have opted out.
  - We may use this information in support of initiatives to improve the driving ecosystem as a whole. This can include cooperation with various entities, such as Public-Private Partnerships or other collaborations to improve vehicular mobility generally, reduction in greenhouse gasses, improvements in vehicle-to-vehicle communications and sensing, autonomous vehicles, better management of auto insurance and warranty services, and similar kinds of socially beneficial activities.
  - We will use the Vehicle Operation Information to support internal research and development (see below), to assess our wider understanding of vehicle performance, to support future performance developments on a fleet wide or vehicle model basis, as well as to assess specific issues, and aid in diagnostics and servicing, in relation to the vehicle. This may include sending you notifications by email or SMS, in accordance with our legitimate interests and your preferences. You have choice and control in Vehicle Data Sharing (VDS), this is switched off as default. Switching it on

will share vehicle data with us to help us develop and improve our vehicles, products, and services.

- Internal research and development
  - For internal research, development, analytics, analysis and reporting purposes, e.g. to monitor and assess vehicle performance, predict trends or performance, develop new functions, products and services, or to evidence compliance with regulatory requirements.
  - We will use personal data where identified to be necessary for internal research and development purposes. Generally, we will use anonymised information to produce statistical analysis of the Vehicle Identification Information, Location Information, Journey Information, Vehicle Operation Information, and InControl Services to enable us to improve our product and overall customer service.

- **Log information:** We use Log Information as follows:

- We collect and process Call Log Information for the provision of our services to you, to investigate system issues or potential misuse of the InControl Package and we use anonymized or pseudonymized and aggregated Call Log Information to improve our operational processes regarding, as applicable, our SOS Emergency call, Optimised Jaguar Assistance, Stolen Vehicle Locator, InControl Pro Features, and Live Features. Unless otherwise notified to you, we do not record calls.
- We collect and process Website and App Logs Information about your usage of the My Jaguar InControl website and InControl Remote Smartphone App for website/app logging and to investigate technical issues. We use anonymized or pseudonymized and aggregated Website and App Logs Information for analytics purposes, to maintain and improve the quality of the InControl Package and app features, fault diagnosis, and to improve the customer experience on our websites and apps. Please also see the Cookies section above.

- **Security Authentication:** this information is automatically communicated between our providers of security authentication and hosting services in order to verify identity and prevent unauthorised use of InControl Package;

- **“Live” Information:** this information is stored on the Vehicle and transferred to JLR or our service providers as necessary to facilitate the service; enable secure access to, and download of, Live Features from our service provider(s); and to store your settings, data and content relating to Live Features.

We may use Covered Information to generate statistics and analytics about your use of the InControl Package or to assess information that may be of interest to you. This allows us to personalize your InControl Services and the communications you receive from us, detect and prevent fraud or misuse of the InControl Package, and address security concerns.

We may use Covered Information for internal purposes, and disclose Covered Information to any third parties, for any legitimate business purpose as described by this Policy. Generally, such Covered Information is processed such that it can no longer reasonably be linked to you and/or your Vehicle. As noted above, the anonymized information is not considered Covered Information under this Policy. Prior to disclosing any such anonymized information to any third party, we impose requirements upon any such third party to prevent them from attempting to de-anonymize any and all such anonymized information.

We may also use your Covered Information to contact you about goods and services that may be of interest to you and InControl Package-related messages, as well as to communicate with you about maintenance and repair needs or make you aware of special promotions. We may contact you about these by mail, email, telephone, or text, including via autodialed or prerecorded messages to your home or cellphone. You will be able to register your preferences about such uses via the My Jaguar InControl website. Regardless of the marketing choices you select, we may continue to contact you through various channels for InControl Package-related purposes. For additional information regarding the use of your Covered Information for marketing purposes, please see the below section entitled "Use of Information for Marketing Purposes."

## **DISCLOSURE OF YOUR INFORMATION**

We may transfer or disclose Covered Information collected as described in this Privacy Policy to third parties for the purpose of providing the InControl Package to you or otherwise in connection with the InControl Services: our InControl Connectivity Services providers, the emergency services, our road side assistance provider, our stolen vehicle tracking provider, local authorities, our authorized retailers, our provider of "Live" app hosting services, the Network Provider(s) for InControl Services, your Trial Plan and/or Data Plan, our provider(s) of anonymized analytics services, and our marketing services provider(s) as described below.

We have safeguards in place with our service providers to ensure that Covered Information is kept securely and only used for the purposes set out in this Privacy Policy.

We may also share Covered Information with those third parties who need to handle it so we can provide to you the products, services you are eligible for, have signed up to or requested, or that are appropriate for your vehicle, for example, InControl or in-vehicle available services, or Software Updates.

We may also share Covered Information with our parent, subsidiary, affiliated companies, and other businesses or persons for the purposes of processing such information on our behalf, for customer relationship management purposes, and/or for promoting our goods and services or in connection with technologies and services associated with your Vehicle (for example, to facilitate navigation system map updates or engage in joint marketing), some or all of which may store and/or process your information on servers outside of the United States, including in the European Economic Area ("EEA") and/or other countries to the extent required for us and/or our service providers to provide the InControl Package. We require that these parties agree to process such Covered Information in compliance with our Privacy Policy or in a similar, industry-standard manner, and we use reasonable efforts to limit their use of such Covered Information and to use other appropriate confidentiality and security measures. By submitting your personal data, you agree to this transfer, storing and/or processing.

We may also share Covered Information collected by us with our authorized Jaguar retailers to assist them in servicing your Vehicle and in delivering an improved customer experience to you.

We may also pass the Covered Information collected above to third parties:

- To fulfill any of the purposes described above in the “Uses Made of Information” section;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request, including the possibility of providing information about your Vehicle’s location;
- to protect the rights, property or personal safety of JLR, its users, customers or the public; or
- to enforce or apply the InControl Terms and Conditions; or
- to investigate potential breaches, fraud, or misuse.

We may also share Covered Information with third parties or service providers that handle marketing communications on our behalf, including for co-branded offers, subject to you not having chosen to prevent certain marketing communications from us. Unless required or permitted by law, we will **not** share your (or your Vehicle’s) non-anonymized geolocation or driving behavior data with unaffiliated third-parties for their exclusive or independent use without your consent.

We may share non-personally identifiable information (such as anonymous user usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with third-parties to demonstrate the usage patterns for JLR’s advertisements, content, functionality promotions and/or services on the My Jaguar InControl website, communications, and/or on third-party websites.

#### **‘REMEMBER ME’ FUNCTION**

Your Vehicle has a ‘remember me’ function for certain features of the InControl Package. This function enables you to remain automatically logged in on the Vehicle for more convenient access to the features. Please be aware that while this function is active any other person using the Vehicle will be able to access any of your stored settings, Live Features and personal details in the Vehicle and to use the InControl Package in the Vehicle as if they were you. If you do not wish other Users to have access, it is your responsibility to ensure the ‘remember me’ function is disabled and to log-out from the relevant features.

#### **USE AND DISCLOSURE OF INFORMATION FOR MARKETING PURPOSES**

In addition to the uses of Covered Information described above, we also use Covered Information to contact you about goods and services that may be of interest to you, as well as to communicate with you about maintenance and repair programs or make you aware of special promotions. We may contact you about these by any number

of channels, unless you have asked us not to do so, such as: mail, email, telephone, or text, including via autodialed or prerecorded messages to your home or cellphone.

In order to communicate with you, we may work with our selected third-party service provider(s) who handle marketing communications on our behalf.

You have the right to ask us not to use Covered Information for marketing purposes. You are able to change your preferences to receive marketing information via the My Jaguar InControl website and the InControl Remote Smartphone App. You may also contact us at the address in the below "Contact Us" section regarding changing your preferences. Regardless of the marketing choices you select, we may continue to contact you through various channels for non-marketing, InControl Package-related purposes (e.g., product recalls, repairs and maintenance needs, etc.).

We will **not** share your (or your Vehicle's) non-anonymized geolocation or driving behavior data with unaffiliated third-parties for their exclusive or independent marketing purposes without your consent, nor will we use your (or your Vehicle's) geolocation or driving behavior data for our own marketing purposes without your consent.

## **SECURITY**

We use reasonable administrative, physical, and technical security measures such as encryption technologies or authentication systems to protect Covered Information against loss, misuse, alteration, disclosure, destruction, theft or unauthorized access.

When you have chosen a password that enables you to access the My Jaguar InControl website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone, nor will we ever ask you for this password.

In connection with the use of the "Stolen Vehicle Locator" service at the time of set-up of your InControl Services account, you will create a PIN and provide an answer to a security question. In the event that you make use of the Stolen Vehicle Locator service, you will be required to provide your PIN and/or the answer to the security question to the operator.

The transmission of information via the Internet is not completely secure. Although we will do our best to protect Covered Information, we cannot guarantee the security of Covered Information when stored with us or transmitted over the Internet; any transmission or storage is at your own risk. When you are logged into the InControl Remote Smartphone App or My Jaguar InControl website, some of your personal data may be stored by your Device in local cache and will be kept until you log out.

We require all of our services providers (those entities performing services on our behalf) to have appropriate measures in place to maintain the security of Covered Information.

We are not responsible for any third-party products or services you access via the InControl Package

## **CHANGING YOUR ACCOUNT PROFILE SETTINGS**

If you wish to update your account profile settings, you may do so via the My Jaguar InControl website.

## **INFORMATION FROM CHILDREN**

InControl is not intended or designed to attract children under the age of thirteen (13). We do not collect personally identifiable data from any person that we know to be under the age of thirteen (13). In any case, **InControl IS NOT INTENDED FOR USE BY CHILDREN UNDER 13 THAT ARE UNACCOMPANIED BY THEIR PARENT OR LEGAL GUARDIAN.**

## **YOUR CALIFORNIA PRIVACY RIGHTS**

Under California's "Shine the Light" law, California residents who provide personal information in connection with obtaining products or services for personal, family or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g., requests made in 2014 will receive information regarding 2013 sharing activities).

To obtain this information on behalf of JLR, please send an email message to [incontrolprivacy@jaguarlandrover.com](mailto:incontrolprivacy@jaguarlandrover.com) with "Request for California Privacy Information" in the subject line and in the body of your message. We will provide the requested information to you at your e-mail address in response.

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

## **UPDATES TO THIS POLICY**

If we decide to change this Privacy Policy, we will make an effort to post those changes in the Privacy Policy section of the My Jaguar InControl website so that you will always be able to understand what information we collect, how we use that information, and under what circumstances we may disclose that information to others. Your use of the InControl Services, My Jaguar InControl website, or InControl Smartphone App following the posting of those changes on the MyJaguar InControl website of any amendment of this Privacy Policy will signify your assent to and acceptance of its revised terms for all previously collected information and information collected from you in the future. Notwithstanding the foregoing, if we make a change to the Privacy Policy that requires your consent, you will be required to view such change on the My Jaguar InControl website and choose whether to accept (or reject, if applicable) the change or terminate your InControl Services.

## **CONTACTING US**

If you have additional questions or comments of any kind about this Privacy Policy or any of our privacy practices, please let us know by e-mail or by sending your comments or requests to:

Jaguar Land Rover North America, LLC  
100 Jaguar Land Rover Way

Mahwah, New Jersey 07495-1100  
Attn: Customer Care – Privacy Issues  
**800 – 452 – 4827**  
[incontrolprivacy@jaguarlandrover.com](mailto:incontrolprivacy@jaguarlandrover.com)