

Effective Date: January 2025

# Changan Privacy Policy

Welcome to driving Changan! We appreciate your interest in the products and services we offer. We value data protection very seriously and are committed to protecting your privacy. This Privacy Policy („**Policy**“) is designed to inform you about how we collect, process, and protect your personal data („**Data**“) when you use our services through our website („**Services**“).

## 1. Who is responsible for your Data?

Changan Automobile Deutschland GmbH, („**Changan**“, „**we**“, „**us**“ or „**our**“), which coordinates the activities of Changan in Europe, and operates the website [www.changanauto.eu](http://www.changanauto.eu), processes your Data in connection with the Services. If you do not provide some Data, you may not be able to access certain Services we offer.

When you use Changan Auto vehicle Technologies and Services or the related App Changan and Changan's other national sales companies process your data to ensure the proper delivery of services throughout Europe. More information can be found in the relevant section of the Vehicle and of the App interfaces.

If you have any questions or concerns, you can contact us by email: [privacy@changanauto.eu](mailto:privacy@changanauto.eu)

## 2. Data categories and purposes of processing

You can use most of our Services without sharing Data with us. When you navigate the Changan website, some information, as the IP address, is transmitted to provide you with the Services, such as the latest updates for the customer management of your region. At this time, we also receive information about your device type, the operating system, the browser and the screen resolution. We cannot use this data to identify you. We use this data to provide you with the Services and to better understand how our Services are accessed and performed. You can find more information about the use of Cookies in our [Cookie Policy](#).

We collect, process and use Data only if you will share it with us, for example, by filling out a webform, by contacting us via email, or to execute a contract. The amount of Data we collect, process and use will vary depending on how you interact with us and use the Services. You have no legal or contractual obligation to share your Data with us. However, if you do not provide your Data, certain functions of our website may not be available or may be available with limited functionality. Specifically, we collect, process and use Data when you:

- Access our Changan website and use the content or individual functions of the website.
- Contact us by webform or correspond with us directly for information about products or services. In particular,
  - Request a test drive with one of our Changan vehicles.
  - Request a quotation for a Changan vehicle you have configured.

- Sign up for our newsletter.

The types of Data you can provide include the following:

- Your **contact details**, such as first name, last name, address, telephone number, email address.

We process your Data relying on the following legal bases and for the purposes described:

- **Your consent** (Article 6 par. 1 lit. a) GDPR), which you voluntarily provide through ticking the box before submitting your request via webforms or otherwise. You can withdraw your consent at any time. We rely on consent in particular to provide to you:
  - customer care, e.g. enquiries about our products or services that we receive by webform, email, telephone call or contract form;
  - promotional and marketing content, such as email newsletters and/or personalised contact to keep you up to date with the latest information about our products and services.
- The **fulfilment of our contractual obligations** in the context of providing our Services or ordering Changan vehicles (Article 6 par. 1 lit. b) GDPR), namely:
  - processing requests for test drives, such as check availability and organise the appointments, and following up on test drives;
  - providing customer care, such as responding to your requests by email or phone;
  - processing service and maintenance, or warranty claims.
- The **fulfilment of our legal obligations** (Article 6 par. 1 lit. c) GDPR); we process Data to the extent necessary to comply with legal obligations or to defend against legal claims; for example:
  - to comply with business or tax reporting obligations, release in accordance with administrative or court orders, such as to process traffic offences committed during test drives.
- **Our legitimate interest** (Article 6 para. 1 lit. f) GDPR), in particular to:
  - improve our existing products and services. We may anonymise and aggregate the Data we collect (so that it does not directly identify you) to improve our products and

services, to understand usage, improve existing features, develop new features, and occasionally request custom incident reports to troubleshoot problems and improve the user experience.

- secure the operation of IT systems. The collected data is processed to ensure IT system operations, including data backup and restoration, system logging and monitoring, unauthorized access detection and prevention, and fault and problem management.
- disclose information to third parties. Even if not legally obliged to do so, we may disclose your Data to third parties, in particular law enforcement authorities, if we have reasons to believe that this is necessary or appropriate; in particular, to support investigations, prevent harm, defend legal claims, or protect the property, security, integrity, and safety of Changan, its customers, products and Services, or others.

### 3. Disclosure of Data

We may need to share your Data with the following parties:

**Changan Group.** Depending on the Services you use and in order to provide it, we may share your Data with other Changan companies and/or affiliates.

**Service providers.** Data may be shared with third-party vendors and service providers who perform services on our behalf, including postal and email services, fraud prevention, web hosting, delivery, and analytics.

**Corporate transactions.** If Changan undergoes corporate or business structure changes, such as a merger, acquisition of our business, sale of assets or shares, restructuring, financing, your Data may be shared with involved third parties.

**Law enforcement.** If required by law or if we believe that such action is necessary to comply with the law or the reasonable requests of law enforcement, we may disclose your Data to third parties, such as government agencies and judicial and law enforcement authorities.

### 4. Security and storage of Data

We take appropriate technical and organizational measures in order to protect your Data managed by us. We prevent accidental or unlawful destruction, loss, alteration or damage of Data. All Data collected by us is stored on secure servers within the European Union. Your Data may be transferred, processed and stored outside the jurisdiction in which you are located, but within the European Economic Area or the United Kingdom, where we and our third party service providers or other group companies have facilities. We are continuously improving our security measures in line with technological development.

### 5. Retention

We will only retain your Data in accordance with the storage limitation period, that is, for as long as necessary to fulfil the purposes for which we collected it, including the purposes of fulfilling any legal, accounting or reporting requirements.

We consider the nature and sensitivity of the Data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your Data and whether those purposes can be achieved by other means, and applicable legal requirements to determine the appropriate retention period for Data.

Data processed for the purposes of marketing and direct communication are stored from the moment you give consent until the moment you withdraw the consent. When you withdraw your consent, we will no longer use your Data for these purposes, although Data may still be kept if and to the extent we have a legitimate interest or a legal obligation in further retention, as stated above under point 2.

Data processed for the purpose of a contractual relationship, as for test drive or for providing an offer, are stored as long as necessary to fulfil our obligations arising from a potential contract with you, and if and to the extent we have a legitimate interest or a legal obligation in further retention, as stated above under point 2. After termination of the contract, we will normally retain your Data up to 10 years to comply with legal, accounting or reporting requirements.

In some circumstances, we may anonymise your Data (so that you are no longer identifiable) for research or statistical purposes in which case we may use this information indefinitely.

## 6. Your rights

As a data subject you have the following rights regarding your Data:

- **Right of access.** You have the right to obtain confirmation as to whether we process your personal data (Article 15 GDPR). This information includes the categories of data we have processed, the purposes for which we have processed the data and the retention periods, the source of the data, and, if applicable, the categories of recipients with whom we have disclosed your data. You can obtain a copy of your personal data free of charge. We reserve the right to charge you for additional copies.
- **Right to rectification.** You have the right to obtain rectification of inaccurate or incomplete personal data that we hold about you (Article 16 GDPR).
- **Right to erasure** ('right to be forgotten'). You have the right to request the erasure of your personal data, provided there are legal requirements in place to support this. (Article 17 GDPR).
- **Right to restriction.** You have the right to request the restriction of the purposes for which we process your personal data, subject to certain conditions (Article 18 GDPR).
- **Right to portability.** You have the right, under certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used and machine-readable format, or to request the transfer of your personal information to another controller (Article 20 GDPR).

- **Right to object.** You have the right to object to the processing of your personal data on grounds relating to your particular situation. In particular, you have the right to object if we do not need to process your personal data to comply with a contractual or legal obligation, or if we use your data for our direct marketing (Article 21 GDPR). This does not apply if we can provide compelling legitimate reasons for the processing that outweigh your interests. You have the right to withdraw your consent at any time with effect for the future with respect to the Data we have processed on the basis of your consent. Our use of your Data prior to your withdrawal will not be affected.

If you wish to exercise any of these rights, please contact us at [privacy@changanauto.eu](mailto:privacy@changanauto.eu) or by using the contact details below under point 7.

We care about your rights and concerns very seriously, and make every effort to respond as soon as possible. However, if you believe that we have not adequately addressed your requests or concerns according to the data protection law, you have the right to file a complaint with the competent data protection authority, without prejudice to any other administrative or judicial remedy.

The competent data protection supervisory authority is:  
 Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)  
 Promenade 18  
 91522 Ansbach  
 Germany

Alternatively, if you are based in the UK, you may lodge a complaint with the Information Commissioner's Office (ICO) who can be contacted at:

- Information Commissioner's Office
- Wycliffe House
- Water Lane
- Wilmslow
- Cheshire
- SK9 5AF
- ICO website: <https://ico.org.uk/global/contact-us/>

You can find the list of data protection authorities in EU at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en). If you are based in the UK, you have the right to file a complaint with the Information Commissioner's Office (ICO) via this link: <https://ico.org.uk/make-a-complaint/>. If you are based outside the EU, EEA, or UK, different conditions may apply to the exercise of your data protection rights.

## **7. Contacts**

Controller according to the GDPR is:

Changan Automobile Deutschland GmbH  
Georg-Brauchle-Ring 56-58  
80992 Munich  
Germany

Email: [privacy@changanauto.eu](mailto:privacy@changanauto.eu)

Alternatively, if You are based in the UK, you may contact our UK representative at:

CHANGAN UK R&D CENTRE LIMITED  
Building 3500, Parkside, Birmingham, B37 7YG

Email: [privacy@changanauto.eu](mailto:privacy@changanauto.eu)

We will respond to your request within one month. We will inform you in case we need to extend this timeline in light of the complexity of your request and/or for other reasons permitted under law.

## **8. Updates to the Policy**

We periodically review and improve our Services and procedures from time to time. Accordingly, we may update this Policy from time to time, so please check this page regularly. Updates to the Policy will take effect on the effective date indicated in each version of the Policy and will be published on this page.