**In-Vehicle Emergency Call System (eCall) Privacy Notice**

| **Data Controller** | Türkiye’nin Otomobili Girişim Grubu Sanayi ve Ticaret Anonim Şirketi **(‘‘Togg’’)** |
| --- | --- |
| **Address** | Bilişim Vadisi, Muallimköy Mahallesi, Deniz Caddesi, No:143/1 41400 Gebze/Kocaeli-Türkiye |

As **Togg**, we have prepared this Privacy Notice in order to ensure that you are informed about the personal data processing, storage, and transfer of your personal data that we collect in accordance with Personal Data Protection Law No. 6698 **(“KVKK”)**,The Regulation Type-Approval Requirements for the Deployment of the eCall In-Vehicle System Based on the 112 Service **("Regulation")**, and the relevant legislation.

In the in-vehicle emergency call system **(''eCall'')** processes carried out by Togg, your vehicle will send the following information and the legally required minimum amount of data when eCall is activated manually or automatically, and a voice call will be made to the emergency call center:

* The data is limited to the last three positions of the vehicle, as it is necessary to determine the current position and direction of travel at the time of the incident,
* Vehicle identification number,
* Vehicle type, brand, model, age and color information,
* The number of passengers,
* Type of triggering of the emergency call system (manual/automatic) and timestamp,
* Type of vehicle's tractive power storage.

Your personal data will be processed and transferred to the emergency call center limitedly for the purposes of conducting emergency management processes, conducting activities in compliance with legislation, conducting communication activities, conducting goods / service after-sales support process, according to the *“It is necessary for compliance with a legal obligation to which the data controller is subject”* legal basis regulated in Article 5 (2) of the KVKK. Your processed personal data will only be used within the scope of the eCall service.

If a period of time is specified in the law or relevant legislation for storage of your personal data, the data in question must be kept for at least this period. If a period of time is not stipulated in the law or relevant legislation; it is stored for reasonable periods of time determined in connection with the purposes of processing, provided that it is limited and measured. In this regard, your collected data will be kept for 2 hours after the emergency call for various investigations. After the end of this period, your data will be automatically deleted from the system.

Your personal data may be transferred to authorized public institutions under legal regulations in order to fulfill our legal obligations.

The eCall system is active by default and cannot be deactivated. However, there is no constant and continuous screening by means of the system. All transactions related to eCall are carried out in line with the principles of individual fundamental rights and freedoms.

You have the rights regarding your personal data;

* to learn whether your personal data are processed or not,
* to demand for information as to if your personal data have been processed,
* to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
* to know the third parties to whom your personal data are transferred in country or abroad,
* to request the rectification of the incomplete or inaccurate data, if any,
* to request the erasure or destruction of your data under the conditions referred to in KVKK,
* If you request correction of missing or incorrect data and deletion or destruction of your personal data, to request that this situation be notified to the third parties to whom we transfer your personal data,
* to claim compensation for the damage arising from the unlawful processing of your personal data.

You can forward your applications and requests regarding your personal data to Togg using the following methods:

* By sending an electronic mail message to [togg.kvkk@togg.com.tr](mailto:togg.kvkk@togg.com.tr) address,
* By filing an application personally with a valid identity card,
* By sending a wet-signed application accompanied by a photocopy of your identity card, to the address of Bilişim Vadisi, Muallimköy Mahallesi Deniz Caddesi No:143/1 41400 Gebze/Kocaeli,
* By sending an e-mail message with mobile signature or secure electronic signature to [togg.kvkk@togg.com.tr](mailto:togg.kvkk@togg.com.tr) address,
* By your registered e-mail address in our systems; to [turkiyeninotomobili@hs01.kep.tr](mailto:turkiyeninotomobili@hs01.kep.tr) registered e-mail address (KEP) by your registered e-mail address (KEP) and secure e-signature or mobile signature;

forward Togg.