

FCA US LLC ("FCA," "we," or "us") Company Vehicle Program Privacy Notice

Effective Date: January 1, 2023

Vehicles (each a "**Vehicle**") provided pursuant to the FCA Company Vehicle Program (which includes Fast Feedback, Product Evaluation, Employee Lease, and Field Vehicle programs) (herein, the "**Program**") are equipped with connected services, which include certain in-vehicle and onboard systems, sensors, software, features, and equipment, as well as mobile applications and other features, technologies, and services we make available associated with the connected services (the "**Connected Services**"), and may also include other telematics, diagnostic and Vehicle-related equipment, services and features (together with the Connected Services, referred to as the "**Vehicle Services**"). This FCA Company Vehicle Privacy Notice (the "**Company Vehicle Privacy Notice**" or the "**Notice**") applies to the information, including personal information and sensitive information, that FCA collects related to the Program, Vehicle, and Vehicle Services.

BACKGROUND. The Program was established to enable FCA to test and evaluate Vehicles and the Vehicle Services (including quality, performance and appearance), detect and correct issues, and increase positive exposure to Vehicles and the Vehicle Services by potential customers. Participation in the Program by eligible participants is optional and subject to FCA's discretion. Any participation in the Program and access to and use of Vehicles and the Vehicle Services is subject to (as applicable) the Company Vehicle Program Terms and Conditions ([FullTermsConditions Active.pdf \(sharepoint.com\)](#)), Retiree Lease Program Terms and Conditions ([www.chryslercocar.com/retiree/pdf/FullTermsConditions.pdf](#)), and all other agreements between FCA and Participants and/or other authorized users of Vehicles related to the Program (collectively, the "**Program Terms**").

To register for and participate in the Program, you must agree to Program Terms and to the collection of data from and about the Vehicle and the Vehicle Services, as described in this FCA Company Vehicle Program Privacy Notice.

In order to access and use many of the Connected Services, you must also register Vehicle(s) for a Connected Services account, which is subject to the FCA Connected Services Terms of Service (available at [Terms of Use \(chrysler.com\)](#)) and the FCA Connected Services Privacy Notice (available [here](#) on [driveuconnect.com](#)).

ACKNOWLEDGEMENT AND AGREEMENT: Vehicle Services will be activated for all Vehicles obtained and used pursuant to the Program. As a result: (i) personal information, including vehicle, performance and driving data, precise geolocation information, biometric data, and other sensitive information may be generated, retrieved, and collected from Vehicles and the Vehicle Services; (ii) this personal information and sensitive information will be used, disclosed, and otherwise processed as described in this Notice, including to evaluate, test, operate, analyze, and improve Vehicles and the Vehicle Services, promote Vehicles and the Vehicle Services, and as otherwise described herein; and (iii) over-the-air, automatic firmware, and software updates may be made to Vehicles and the Vehicle Services.

INFORMATION COLLECTED. FCA will access and collect personal information, including sensitive information, about you and other drivers, from Vehicles and the use of the Vehicle Services. The information we collect varies depending upon the circumstances, and includes:

- **Precise Geolocation data:** GPS location information about Vehicle.
- **Driving data:** speed, acceleration and braking data; direction of travel; trip data (mileage, date, length, conditions); ignition events; steering events; cruise control data; seatbelt status; information about vehicle incidents or events including crash notifications; and other information about how Vehicle is driven.
- **Performance data:** odometer, mileage, MPG and emissions data; tire pressure data; temperature readings; throttle and engine performance; weather and other driving conditions; fuel levels and refueling activity; battery levels and status; images from exterior cameras; and other performance, mechanical and operational data.
- **Diagnostic and service data:** trouble or error codes; diagnostic data; odometer readings; collision information; services and maintenance alerts; oil, coolant, oil, and fluid levels and temperatures; service and maintenance activities and history; and data from any telediagnostic equipment installed in the Vehicle.
- **Usage data:** destination and points of interest; roadside assistance and emergency services calls, including date, time, duration, purpose and result; and vehicle presets, feature usage and stored settings.

- **Other Vehicle Services information:** other information about your use of Vehicle Services, including which features or services you activate, access and use and how you use them.
- **Data from third parties:** such as weather, traffic, location information, and road or other conditions which we may correlate with the other information that we have collected.
- **Other Driver and Program data:** other data that you provide to us related to the Program, such as name, contact information, insurance information, driver's license and other identifiers for you and authorized drivers of Vehicle.
- **Evaluations, feedback and other data:** feedback, evaluations, reports, and other comments about the Vehicle or the Vehicle Services, and your communications with us related to the Program or Vehicle.

We may collect, access and receive the above information even when: (1) you have not registered Vehicle for a Connected Services account, and (2) a Vehicle is parked and/or not in operation. We will retain the personal information we collect as long as reasonably necessary for purposes for which we collect and use such information, as stated in this Notice.

Categories of personal information under the CCPA. The personal information we may collect related to the Program, Vehicle and Vehicle Services may include the following categories of personal information as defined under the California Consumer Privacy Act (CCPA): (i) identifiers and contact information that identifies you or that allows us to contact you, such name, address, phone number, email address, account name, Internet Protocol address, VIN, or other similar identifiers; (ii) customer records, such as payment information, credit card account number and related information; (iii) commercial information, including records of products or services purchased or considered, usage of the Vehicle Services, and other purchase or usage histories; (iv) internet and other electronic activity information, including, but not limited to, usage history and your interaction with Vehicle Services or other online services; (v) precise geolocation information; (vi) audio, visual and other electronic data related to your Vehicle usage or interactions with us; (vii) biometric information; (viii) professional and employment information (e.g., in order to determine your eligibility for the Program); and (ix) profiles, inferences and trends derived from the personal information we collect. This personal information also includes sensitive personal information under the CCPA, including biometric data, financial account numbers (i.e., for vehicle lease payments), and driver's license and other government identifiers.

USE AND PURPOSES. While our use of your personal information depends upon the circumstances, generally, we may use and disclose the information we collect for the following purposes:

- Providing our services and related support.
- Evaluating, analyzing and improving vehicles, products and services.
- Developing new vehicles, products, features and services.
- Research, safety, recall and warranty purposes.
- Personalizing content and experiences.
- Communicating with you.
- Promote our vehicles.
- Improve our marketing, sales and advertising.
- Securing and protecting our assets and rights (including to locate and recover Vehicles we believe to be lost, stolen or retained beyond the permitted term).
- Protecting and defending our rights and the health, safety or rights of others.
- Complying with legal obligations.
- In support of our general business operations.
- To enforce the Company Vehicle Program Terms and Conditions.

DISCLOSURES. We may disclose the information we collect to third parties, for the purposes identified in the "Use and Purposes" section above, which generally include:

- Affiliates or subsidiaries of the FCA Group;
- Third-party vendors, service providers, contractors or agents who perform functions on our behalf;

- If applicable, third parties who provide or support a particular feature, service or application (such as roadside assistance providers, SiriusXM, providers of navigation and traffic services, and emergency service providers and responders);
- If applicable, other users to whom you grant access to your Mopar or Connected Services account; and
- Third parties who may use this information for their own research, development, marketing and analytics purposes, such as to better understand aggregate driving and traffic patterns or analyze road conditions.

We also disclose information (including personal information) as otherwise necessary in support of our business and operational purposes, which may include the following disclosures:

- To another company as part of any merger, acquisition, financing, sale of company assets or interests in the respective company, or in the case of insolvency, bankruptcy, or receivership, including during negotiations related to such business transfers.
- To protect or defend the safety, rights, property, or security of FCA, third parties or the general public, including to protect the Vehicles and our services, to detect, prevent, or otherwise address fraud, security, technical issues, or other activity which we, in our sole discretion, consider to be, or to pose a risk of being, illegal, unethical, or legally actionable activity.
- As evidence in litigation in which we are involved, and as necessary to enforce our agreements and policies.
- To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding, in response to a subpoena, warrant, court order, or other legal process, or as part of an investigation or request, whether formal or informal, from law enforcement or a government official.

We also may collect, use and disclose Vehicle information (including, but not limited to, geolocation information) to: (i) locate and recover Vehicles we believe to be lost, stolen or retained beyond the permitted term, (ii) otherwise enforce the Company Vehicle Program Terms and Conditions, and/or (iii) take or initiate actions or proceedings related to Vehicle recovery or enforcement of the Company Vehicle Program Terms and Conditions.

Additional Disclosures and Connected Services Account. If you register Vehicle(s) for a Connected Services account, your personal information will be collected, used, disclosed and otherwise processed as set forth in the [Connected Services Privacy Notice](#). This may include certain disclosures that could be considered “sales” and “sharing” under the CCPA and other state privacy laws (as applicable). Please review the [Connected Services Privacy Notice](#) for more information about such disclosures and the choices you have. If you are a California resident, you can find information about your CCPA opt out rights [here](#).

CONTACT. If you have any questions about this Company Vehicle Privacy Notice or the information we have collected related to the Program and the Vehicle Services, you may contact us at dprivacy@stellantis.com.