

## mbrace Privacy Notice

Effective: July, 2024

Privacy Policy

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# Privacy Policy

## **MERCEDES-BENZ - Verizon Connect Privacy Policy - mbrace Service Model Year 2018 and prior vehicles.<sup>1</sup>**

This privacy policy (the "Policy") describes what information Mercedes-Benz USA, LLC ("MBUSA") and Verizon Connect ("VZC") collect in connection with the mbrace services, why we collect it, and under what circumstances and in what ways that information may be used or shared with each other, with our affiliates, and with other third parties. This Policy also explains your rights under certain privacy laws. This Policy is not intended to limit any data usage provisions contained in the Mercedes-Benz mbrace Terms of Service (the "Terms of Service") that you agreed to in order to receive the mbrace services or any other agreements that you may enter into with VZC or MBUSA. Please read this Policy and the Terms of Service carefully. Please note that this Policy may be changed from time to time, and that any changes will supersede the current Policy. In the event of a change, we will send you a copy of our new policy, and we may ask you to consent to it, but in all instances you will always be able to find our current Policy at [www.mbusa.com/mbrace](http://www.mbusa.com/mbrace). Your continued use of mbrace services after any such change is made constitutes acceptance of the terms of the modified Policy.

Residents of California, Colorado, Connecticut, Utah, Oregon, Texas and Virginia can visit [Legal Notices | Mercedes-Benz USA \(mbusa.com\)](http://www.mbusa.com/legal) for additional information from MBUSA about its data practices.

### **Privacy Policy Highlights:**

VZC and MBUSA may share with each other, and with their affiliates and service providers, the information obtained from you or from your vehicle, or derived from your use of mbrace.

VZC, MBUSA and their affiliates and service providers will use such information to provide the mbrace service to you and to occupants of your vehicle.

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<sup>1</sup> Select model year 2018 GLE and C-class vehicles are equipped with Mercedes me connect technology. Ask your dealer for details.

VZC, MBUSA and their affiliates and service providers may also use and disclose such information to provide other services, and to send you messages about other offerings.

## **1. INFORMATION WE COLLECT OR RECORD AND WHY IT IS COLLECTED**

Our primary goal in collecting information is to facilitate the provision of mbrace services such as convenience services, entertainment services such as Wi-Fi, as well as safety and security services, including emergency crash notification, airbag deployment notification and stolen vehicle location services.

For example, to subscribe to the mbrace service, you must provide certain information in connection with the activation of your account and agreement to the Terms of Service, including your contact information (such as your name, address, email and emergency contact), your billing information, a credit card number, information about the purchase or lease of your Mercedes-Benz vehicle (the "Vehicle") and various other information.

We use this information in order to deliver mbrace services, for a statistical analysis of mbrace service usage, to improve our product offerings, to customize the mbrace services, to send you messages about new services, or to send you special offers. We also share your information with your dealer to assist it in servicing your car and to maintain contact with you directly, or through your Mercedes-Benz dealer.

We monitor and/or record conversations you have with our customer service representatives, emergency personnel, or the police. We also record your use of any automated services offered by us for various purposes, such as to assess, maintain or improve the quality of the services, for issue resolution, training purposes, or to promote and to provide the services.

Additionally, to provide the mbrace services, we collect information about your Vehicle including:

- Information concerning your Vehicle's operation, performance and feature utilization to enable MBUSA and VZC to, among other things, improve their respective products and services. Such information includes diagnostic trouble codes, maintenance conditions, such as tire pressure and fuel economy.
- Information about accidents involving your Vehicle, such as whether air bags deployed to notify emergency personnel, and for other services for which you've subscribed.

We do not regularly or continuously monitor or track the location of your Vehicle or estimate its speed unless such information is specifically required for a service for which you've subscribed. Such services include, among other things, to provide you with

directions from a location, automatic collision notification, and vehicle location services in the event your Vehicle is stolen.

If you've agreed in a lease agreement, retail installment contract or other vehicle finance arrangement that vehicle location services may be used to facilitate the location and/or repossession of your Vehicle, we may collect and/or develop, and retain information concerning the location, direction, speed, and other parameters relating to your Vehicle, caller identification, date and time of call and any operator comments, and we may share such information with each other and our affiliates and service providers as described below in the Disclosure of Your Information section.

## **2. DISCLOSURE OF YOUR INFORMATION**

We may share information about activations of the services with your Mercedes-Benz dealer in order to allow the dealer to contact you. We will also share pertinent information with the authorities in the event the stolen vehicle location assistance service has been requested.

MBUSA and VZC use vendors and partners to deliver the mbrace services to you on our behalf. These vendors and partners help us offer, provide, repair, restore, and bill for services we provide. For example, we share your information with roadside assistance providers and emergency service providers (e.g., 9-1-1). We may provide your credit card information and billing address to our payment processing company solely for the purpose of processing payment for a transaction you have requested. We require that these vendors and partners protect the customer information we provide to them and limit their use of MBUSA and VZC customer data to the purposes for which it was provided. We do not permit these types of vendors and partners to use this information for their own marketing purposes.

MBUSA also shares information with third parties who provide marketing services on their behalf. For example, MBUSA may provide your email address in order to send you information about vehicle products and services that may be of interest to you.

Except as explained in this Policy, in the mbrace Terms of Service, or in agreements with our customers, we do not sell, license, or share information that individually identifies you with others outside the MBUSA or VZC family of companies that are not performing work on MBUSA or VZC's behalf without the consent of the person whose information will be shared.

We may be required to disclose personally identifiable information to a government entity to comply with valid legal process such as warrants, court orders, or subpoenas.

## **3. UPDATING OR CHANGING YOUR ACCOUNT INFORMATION**

It is your obligation to correct or update the information you provide upon activation of the mbrace services when that information changes. You may modify this information by contacting us using the information provided below.

#### **4. PROTECTION OF INFORMATION**

MBUSA and VZC use commercially reasonable technical, administrative and physical safeguards to protect against unauthorized access to, use or disclosure of customer information we collect or store. Employees are trained on the importance of protecting customer privacy and on the proper access to, use and disclosure of customer information. Under our practices and policies, access to sensitive personally identifiable information is authorized only for those who have a business need for such access. Personally identifiable and other sensitive records are retained only as long as reasonably necessary for business, accounting, tax or legal purposes.

Although we work hard to protect personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. MBUSA and VZC maintains security and incident response plans to handle incidents involving unauthorized access to private information we collect or store.

#### **5. YOUR CONSENT**

By using mbrace services, you agree to the practices and procedures described in this Policy. You also consent to our contacting you in your Vehicle or at your address, email address or phone number on file for the purpose of delivering mbrace services to you and to discuss your account services, features and benefits. From time to time, we may also send you information about selected products, services or offers we think may be of interest to you. Each email you receive from us for offers will provide a link to unsubscribe to future offers about that product. Alternatively, if you do not want to receive emails about our offers or products, just contact us using the information provided below. Please note that even if you choose not to receive marketing emails from us, you may still hear from us regarding the status of the mbrace services and any other service issues and order status updates that will allow us to provide you with the optimal user experience.

We or our partners or affiliates may also use your name, postal delivery information and phone number to contact you about products, services or offers that we think would be of interest to you. If you do not wish us to contact you offline please contact us using the information provided below.

By giving us your e-mail address and/or obtaining products and/or services through our web sites, you agree to receive e-mail marketing and/or telemarketing calls from us and

our third-party advertising partners. You may always opt-out of receiving promotional calls from us by contacting us using the information provided below.

## **6. SALE OF OUR RESPECTIVE CORPORATIONS**

As in any business venture, the sale, merger or declaration of bankruptcy of a company is always a possibility. Should we ever declare bankruptcy or should our assets ever be acquired by or merged into another organization, all customer information we have collected will be treated as an asset and may be transferred to a third party.

## **7. CONTACT US**

If you have questions, concerns or suggestions related to this Policy or our privacy practices please contact the mbrace customer service line at 1-866-990-9007 or the VZC privacy office using the [privacy inquiry form](#).

## **8. ADDITIONAL RIGHTS UNDER STATE LAWS**

### **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, the California Consumer Privacy Act (CCPA) gives you the right to know what information we collect about you, and how we use it; to access and delete that information within certain limitations, to request that we correct information that you believe is inaccurate; to limit the use of certain sensitive personal information; to tell us not to sell or share personal information about you; and to not be discriminated against for invoking these rights.

### **Your Right to Know**

We detail specific pieces of personal information we collect in connection with the mbrace services and describe how we use them in this privacy policy. The California law requires that we also describe the categories of personal information we collect and use and the sources of that information. We collect personal information when you interact with us and use our products and services. Some information we collect is considered sensitive personal information under California law. The California law defines sensitive personal information to include:

- information that reveals your social security, driver's license, state identification card, or passport number;
- account log-in;

- financial account, debit or credit card number along with required security or access code, password, or credentials allowing access to an account;
- precise geolocation;
- racial or ethnic origin, religious or philosophical beliefs, or union membership;
- contents of your mail, email, and text messages unless we are the recipient of the communication;
- genetic data;
- using biometrics to uniquely identify you and collecting or analyzing personal information about your health, sex life or sexual orientation.

The categories of personal information we collect are:

- Identifiers and contact information associated with your account including your name, billing and email address;
- Legally protected classifications, that may include gender and disability;
- Commercial information about the products, services and vehicles purchased or leased;
- Secure account information including your account log-in credentials, financial account, debit or credit card number with any required security or access code, password, or credentials that allow access to an account;
- Internet or electronic network activity including vehicle operation, performance and feature utilization;
- Geolocation data;
- Audio information such as recordings of conversations you have with call center reps or emergency personnel;
- Inferences we create from the information we collect that create a profile reflecting your preferences, characteristics, predispositions, and behavior; and
- Other information that may identify, relate to, describe, or is capable of being associated with you. This depends on the ways you interact with us.

**How we use these categories of personal information.** We and our service providers use information we collect for business and commercial purposes as they are defined under CCPA. These purposes include providing you products and services, operating our businesses, and engaging in economic activities such as communicating with you and providing customer service; personalizing your experiences; improving our services; providing marketing and advertising; debugging; auditing our processes and services; short-term transient uses; research; and security, fraud, and legal compliance. Service providers we use to do work on our behalf may use information for the same purposes. We may also disclose information for legal compliance, credit and collections, with your consent and as further described in other sections of this Policy.

We share information with service providers as necessary for them to perform work for us. We share with them (including in the last twelve months), the information they need to perform that work. Service providers are required to protect the information we share

with them or they collect on our behalf and use it only for the specific purposes that we allow.

Our policies require that we retain records containing personal information as long as they are needed for legal, tax, audit, investigative, and/or security purposes and then securely delete or destroy them. We incorporate personal information into different types of records; it is not always retained by distinct data element. For example, your name is a part of your account, billing, and technical support records.

### **Your Rights to Access**

You have the right to request access to the specific pieces and categories of personal information we collect pursuant to this Policy. You can request this information by submitting a [privacy inquiry form](#) or calling 1-866-990-9007.

### **Your Right to Delete**

You have the right to request that we delete personal information we have about you unless we need it for specific reasons. The law describes these reasons to include: needing the information to provide the services you have requested and other activities needed to maintain an ongoing business relationship or perform a contract with you, to maintain information security, to exercise legal rights and to comply with other laws. You can request that we delete information we have about you pursuant to this Policy by submitting a [privacy inquiry form](#) or by calling 1-866-990-9007.

### **Your Right to Correct**

You have the right to request that we correct information collected pursuant to this Policy that you believe is inaccurate. You can request this by submitting a [privacy inquiry form](#) or by calling 1-866-990-9007.

### **Your Right to Tell Us Not to Sell or Share Information We Have About You**

California law defines “sale or sharing” broadly to include sharing personal information for monetary or other valuable consideration and the sharing of your information for cross contextual advertising purposes, but the definition does not cover all sharing of personal information. We do not knowingly sell or share personal information related to children under 16 years of age.

### **MBUSA**

The following personal information may be disclosed to our marketing partners:

- Name
- E-mail address

If you wish to opt out of such disclosure of your information by MBUSA, you may submit an opt out request [here](#) or by calling 1-833-808-5050.

### Verizon Connect

Verizon Connect does not sell or share personal information that we collect pursuant to this Policy.

## **Your Right to Limit the Use of Sensitive Personal Information**

This right lets you ask us to limit the use and disclosure of sensitive personal information if we use that information for purposes beyond what is needed to provide the products and services you request or for other reasons specified in the law. These reasons include: detecting security incidents; resisting malicious, deceptive, fraudulent or illegal actions; ensuring the physical safety of a person; short-term, transient uses; performing services such as maintaining or servicing accounts, providing customer service, fulfilling orders and transactions; verifying your information; and verifying, maintaining or enhancing a service on a device that is owned manufactured or controlled by us or on your device. We may also share your information with vendors providing storage or similar services on our behalf.

We do not use or disclose sensitive personal information for other purposes without your consent so we do not offer you an option to limit the use of sensitive information.

## **Your Right to Not Be Discriminated Against**

We do not discriminate against you by denying goods or services, charging different prices or rates for goods or services or providing you a different level or quality of goods and services if you exercise any rights described in this section.

## **Where to Exercise Your Rights**

If you or your authorized agent would like to exercise any of these rights, you may:

- Submit a [privacy inquiry form](#)
- Call our dedicated Privacy Toll-Free Number at 1-866-990-9007

You will be required to verify your identity before we fulfill your request.

## **Reporting**

We did not receive any individual rights requests from mbrace customers in 2023.

## **COLORADO, CONNECTICUT, OREGON, TEXAS, UTAH & VIRGINIA PRIVACY LAWS**



Colorado, Connecticut, Oregon, Texas, Utah and Virginia have comprehensive privacy laws that provide residents with additional specific rights.

**Your right to know what personal information we collect, how we use it and share it and how long we keep it.**

This privacy policy provides details about our collection and use practices. The state laws generally require that we provide you the categories of personal information we collect and the purposes for which we collect each category.

Categories of personal information we collect and the purposes for which we collect them include:

1. Contact and device information (including your name, billing and email address, and identifiers for your vehicle, IP address, and account credentials); and information about the products and services you purchase. We collect this from your interactions with us and your use of our products and services. We use this information to provide you with products and services, operate our business, communicate with you and provide customer service, improve our service, provide marketing and advertising, debug and audit our processes and services, short term transient uses, research, security, fraud and legal reasons.
2. We use demographic and interest information that you provide or we obtain from others (such as device type, carrier, city, and state), inferences and insights about you, protected classifications, information from social media platforms when you interact with us via social media or use social media login to interact with certain Verizon sites or offers, contact and marketing lead information, and fraud information. We use this information for help us better understand our customers and markets, provide marketing and advertising, and to help detect and prevent fraud.
3. Geolocation information; information about how you use our products and services; and audio information from calls you make to us and emergency personnel. We use this information for purposes including business operations; security and fraud protection and prevention; and for the specific purposes we describe when you opt in.
4. Secure account information including your account log-in credentials to provide you with access to your account; for security and fraud prevention and legal compliance purposes.
5. Other information that may identify, relate to, describe or is capable of being associated with you or can be reasonably associated or linked with you.

Geolocation information that we collect may be precise. Precise geolocation is considered sensitive personal information under state laws.

We retain this information only as long as reasonably necessary for business, accounting, tax or legal purposes and then we securely delete it.

Service providers (also known as processors) we use to do work on our behalf may use information for the same purposes, as necessary for them to perform work for us. They are required to protect the information they receive from us or collect on your behalf and use it only for the specific purposes that we allow. We may also disclose information for legal compliance, credit and collections, directory assistance and caller id purposes, with your consent and as further described in other sections of this policy.

### **Your right to access, delete and correct information.**

You have the right to request access to specific pieces and categories of personal information we collected about you pursuant to this Policy. You can request this information by submitting a [privacy inquiry form](#) or by calling 1-866-990-9007. To the extent technically feasible, we will provide this information to you in a portable and readily usable format. You may use this same contact information to request that we delete certain personal information we have about you, unless we need it for reasons specified by the laws, and to correct personal information we have that you believe is inaccurate.

These state privacy laws describe the reasons and business purposes why companies may retain personal information and not be required to delete that information when you submit a request that we delete it. The laws describe these reasons slightly differently, but generally, they include: needing the information to provide the services you use and the internal operations needed to maintain an ongoing business relationship or perform a contract with you; maintaining security; preventing fraud; and exercising our legal rights including defending against legal claims, complying with laws, rules and regulations and cooperating with law enforcement in good faith, by complying with investigative subpoena or summons. We retain personal information only as long as reasonably necessary for these business, accounting, tax or legal purposes and then securely delete it.

### **Use of sensitive personal information.**

These state laws prohibit us from using sensitive personal information without your consent, except for reasons specified in the law. The reasons vary slightly within the different laws, but generally include: complying with laws, rules, regulations, investigative subpoena or summons by governmental authorities; cooperating with law enforcement; investigating, establishing, preparing or defending against legal claims; providing and maintaining the products and services you use, preventing and responding to security and other significant incidents; taking immediate steps to protect an interest that is essential for the life or physical safety; and using information for short-term transient purposes such as displaying relevant information to you based on your activity during a single interaction.

We do not use sensitive personal information without your express consent or as authorized under the law.

**If you are a Colorado, Connecticut, Oregon, Texas or Virginia resident, you have the right to tell us not to use personal information to create profiles about you that are used for decisions that have legal or similarly significant effects.**

The laws define profiling as using automated processing to evaluate, analyze or predict personal aspects related to an identified or identifiable individual's economic situation, health, personal preferences, interests, reliability, behavior, location or movement. The states vary in the level of automated processing that requires an opt out.

We do not use personal information to profile you to further decisions that have legal or similar significant effects.

**You have the right to tell us not to sell personal information or use it for certain targeted advertising purposes.**

The laws vary in the way they define sale and targeting, but generally, they require that you have the ability to limit activities that involve sharing personal information for monetary or other valuable consideration, or from targeting advertising to you using information from your activities across non-affiliated sites and. Targeted advertising does not include displaying advertisements based on your activity within our own website or applications; displaying advertisements based on the context of your search or activity at the time the advertisement is displayed; displaying advertisements in response your request for information or feedback; or using information solely for measuring or reporting advertising performance, reach, or frequency.

We do not sell personal information and we do not use information collected pursuant to this Policy for targeted advertising.

**If you are a resident of Colorado, Connecticut, Oregon, Texas or Virginia, you may appeal a denial of your request to exercise any of your privacy rights provided by state law.**

If we deny your request, we will give you instructions on how you can appeal that decision to the State Attorney General.

**You have the right to not be discriminated against.**

We will not discriminate against you by denying goods or services, charging different prices or rates for goods or services or providing you a different level or quality of goods and services if you exercise any rights described in this section.

**Where to exercise your rights.**

You may exercise your rights or submit any questions about your rights under state laws, by submitting a [privacy inquiry form](#) or by calling us at 1-866-990-9007.

We may require you to verify your identity before we fulfill your request.

## **Nevada Privacy Rights**

Nevada customers can opt out of the sale of their personally identifiable information. Nevada law defines “sale” as the exchange of certain personally identifiable customer information for money, where the recipient also intends to sell that information. Personally identifiable information includes name, address, phone number, Social Security Number or any identifier that can be used to contact you electronically.

Verizon Connect and MBUSA do not sell personally identifiable information today. However, Nevada customers have the right to opt out of the sale of their personal information, even if their information is not currently being sold. To opt out of any future sale of information covered by this Policy by VZC or MBUSA submit a [privacy inquiry form](#).

## **Additional Information for Oregon Residents**

The following VZC entities are registered as active with the Oregon Secretary of State:

- Verizon Connect Inc.
- Verizon Connect NWF Inc.
- Verizon Connect Telo Inc.

The following MBUSA entities are registered as active with the Oregon Secretary of State:

- Mercedes-Benz USA, LLC
- Mercedes-Benz Financial Services USA, LLC