**FORD OTOMOTİV SANAYİ ANONİM ŞİRKETİ**

**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA WITHIN THE SCOPE OF THE VEHICLE DEVELOPMENT PROJECTS**

**(“Privacy Notice”)**

Ford Otomotiv Sanayi Anonim Şirketi (“**Ford Otosan**” or “**Company**”) attributes great importance to the secure and transparent processing of your personal data in conformity with the law and good faith. This Privacy Notice (“**Notice**”) is prepared for the objective of explaining how and for which purposes data relating to you will be processed and how you can manage your rights.

Below, you will find an explanation of general principles for the processing of personal data by Ford Otosan, the purposes for which your personal data is processed and the rights that you have concerning your personal data under the vehicle development projects by Ford Otosan.

This Privacy Notice has been executed in English.

**General Information**

While, being an entity located in the Republic of Turkey, Ford Otosan shall comply with the provisions of the Law No. 6698 on the Protection of Personal Data (“**Law**”), the European General Data Protection Regulation (**“GDPR”**) as far as these laws apply for the processing of personal data by Ford Otosan.

**Data Controller:**

Ford Otomotiv Sanayi Anonim Şirketi

Akpınar Mahallesi, Hasan Basri Cad. No:2, 34885 Sancaktepe, İstanbul, Turkey

Company Registry No: 73232

**Representative (Art. 27 para. 1 GDPR):**

JURCOM GRC SERVICES B.V.

Willemsweg 94 6531 DN Nijmegen, Netherlands

[gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr)

**Data Protection Officer of Ford Otosan:**

You may approach the Data Protection Officer at [dpo@ford.com.tr](mailto:dpo@ford.com.tr) or by addressing a letter to the “Data Protection Officer” at the address of the Data Controller.

**What is Personal Data?**

“**Personal Data**” means any information relating to an identified or identifiable individual (a data subject) in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

**How Do We Collect Personal Data?**

All your personal data processed for the below-mentioned purposes is obtained through the cameras on the data collection tools used in the Projects by our Company.

**Which Personal Data Do We Collect?**

The aim of the Projects is to carry out processes such as development of advanced driving support systems functions and autonomous vehicle by Ford Otosan. In order to develop these functions/processes, in accordance with our legal obligations, real drivers should drive on public roads and the situations encountered while driving should be classified. It is necessary to record images of the road on which the vehicle is driven, the traffic signs it encounters along the road, road markings, the country where the vehicle is located, people, vehicles, animals and other objects in its vicinity by means of the cameras on the vehicle while driving. These images are labelled such as “human”, “animal”, “vehicle”. The purpose of the “human” labelling is to distinguish human from car, truck, traffic signs, animals and/or assets that can be seen on the road. In this way, artificial intelligence algorithms used with autonomous vehicles will understand what the entity encounters while driving and will be at a level to take action accordingly. The recorded data will be used to correlate traffic signs, road markings, road type, driver behaviour and vehicle behaviour in the development of functions.

In this context, your visual data and/or your vehicle data including the vehicle model and license plate number are processed through the outward facing cameras in the data collection tool used in the Projects.

**For Which Purposes Is Your Personal Data Processed?**

Your personal data is processed by Ford Otosan in a limited and measured manner within the scope of the Projects in connection with the processing purposes stated below:

* Planning and executing the Projects and conducting scientific studies and analyses within the scope of the Projects,
* Confirmation that the traffic signs in the captured images are consistent with the legally perceived traffic signs that are not the subject of this Privacy Notice,
* Relationship between road markings, road types, road designs and traffic signs,
* Labelling the entities such as human, objects, animals, vehicles in the captured images,
* Developing autonomous vehicle that distinguish human from other entities may be seen on the road,
* Ensuring that the autonomous vehicle adjusts and takes action according to the people, vehicles, animals and other objects it sees around it.

As can be understood from the above purposes, the purpose of the Projects is by no means to carry out actions to identify a person. Capturing images of people with the vehicle exterior camera is not intended and will not be used for Projects. Developing autonomous vehicle that distinguish human from other entities is the only aim of the Projects. Identity information and/or vehicle information are not necessary for the Projects and it is not possible for Ford Otosan to use this information directly. No attempt is made to identify the person in the captured images, and no race or physical characteristics are classified.

Your personal data may also be processed for the following purposes within the scope of the projects management and compliance activities with the applicable legislation:

* Storing personal data (visual records and vehicle information) collected within the scope of the above-mentioned activities and conducting information security processes in the environments where these data are stored,
* Carrying out all the above-mentioned activities in accordance with the current legislation,
* Follow-up and execution of legal affairs and informing authorized persons, institutions and organizations when necessary.

Your personal data will not be processed for any purpose other than the purposes specified in this Privacy Notice.

**Legal Basis for Processing Personal Data**

Depending on the purposes of processing and its circumstances, in processing your Personal Data we may rely on the following legal bases:

* + Your personal data is processed based on legal reason of "existence of our legitimate interests" for the above-mentioned purposes within the scope of the development of products.
  + Your personal data, which is processed for the purposes of informing authorized persons, institutions and organizations when necessary, following legal affairs, and exercising our right to defense, is processed and transferred to below-mentioned person or organizations based on the legal reasons of "explicitly stipulated in the law", "fulfillment of our legal obligations" and " mandatory for the establishment, exercise or protection of any right”.

**Who May Access Your Personal Data?**

All your personal data (visual records and/or vehicle information) collected as mentioned under this Privacy Notice will be kept only within Ford Otosan and will not be shared with any third party or organization in the country or abroad.

Your personal data will be stored on Ford Otosan servers located in Turkey, and only a limited number of people authorized by the Projects will have access to the data.

Ford Otosan is aware of the importance of protecting your personal data in terms of fundamental rights and freedoms, and attaches great importance to the processing of your personal data in a safe and transparent manner, fair and in accordance with the law. In this context, Ford Otosan takes all necessary administrative and technical measures to ensure the security of personal data.

In case your personal data needs to be transferred to one of the Projects partner companies outside Ford Otosan within the scope of the Projects, your personal data will be completely anonymized before the transfer. Anonymization is carried out in the form of making the data incapable of being associated with any real person.

Ford Otosan may transfer your Personal Data to the legally authorized private individuals and organizations and public institutions including relevant ministries, courts and enforcement offices.

Further information may be obtained by e-mail to [gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr) .

**How do We Protect and Store Personal Data**

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

* pseudonymisation and encryption of Personal Data;
* the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
* the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident;
* a process for regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

**Legitimate Interest and Right to Object**

You may object to the processing of your Personal Data based on legitimate interests of Ford Otosan. Unless your objection is directed solely against direct marketing by Ford Otosan, you have to explain your special situation, which makes the processing of your Personal Data based on legitimate interests unacceptable for you.

To object, please send us an e-mail to [gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr) or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

**Retention**

We only keep your personal information in identifiable form for as long as one of the following applies:

* Within the scope of Ford Otosan product development activities, your Personal Data will be processed for a period of 10 years and will be completely anonymized following the expiry of this period;
* Your information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant limitation period in your jurisdiction);

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please send us an e-mail to [gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr)

**Your rights related to data privacy**

You have the right to request access to and rectification or erasure of your Personal Data, or restriction of their processing. Furthermore, you have the right to request data portability. If you are situated in the EU, you have the right to file a complaint to the relevant data protection authority.

If you have questions or concerns regarding our use of your information, or would like to exercise any of your rights, please send us an e-mail to [gdprrep@ford.com.tr](mailto:gdprrep@ford.com.tr) or a letter to Akpınar Mahallesi, Hasan Basri Caddesi, No:2, 34885 Sancaktepe, İstanbul, Turkey.

**Updates to this Privacy Notice**

We may modify or update this information from time to time. Please check fordtrucks.com.tr/en/vehicle-development-project for the actual version of the data protection notice.