

Privacy Notice of Bentley Motors Limited for the use of the Data Hub

Below, we provide information about the processing of your personal data (“data,” “your data”) by Bentley Motors Limited (Bentley) and your rights under data protection law, in particular under the General Data Protection Regulation (Regulation (EU) 2016/679, “GDPR”).

This privacy notice applies to the processing of your data in connection with the provision of product data and related service data by us in accordance with Articles 4 and 5 of the EU Data Act (Regulation (EU) 2023/2854 (“EU Data Act”)) via the platform provided for this purpose (“Data Hub”).

A. Who is the controller for data processing?

Bentley Motors Limited,
Pym's Lane, Crewe, Cheshire, CW1 3PL, England
DPO@bentley.co.uk,
registered in England and Wales (company registration number 0992897).

B. Collection, processing, and use of your data

I. What data do we process and from which sources does it originate?

We process your data, which we have generally received from you. The following categories of data are regularly relevant:

- **Professional work and organizational data**
 - Contact details (professional): name, address, email, telephone number, company
- **Financial data**
 - Payment data and bank information: bank account details, credit card number
- **IT usage data**
 - User and login data: username, roles, authorizations
 - Logging data: technical logs, activity history, login times
- **Vehicle master data and vehicle identification**
 - Vehicle identification data: VIN, license plate number, production number
 - Vehicle master data: vehicle specifications such as model, engine power, exterior color
- **Legal Transactions / Contract Data**
 - Contract metadata: products purchased, purchase contract, warranties

In addition, to the extent necessary for the performance of obligations imposed by law or the authorities, we process data that we have lawfully received from authorities (e.g. on the basis of legal authority, to execute orders, to fulfil contracts or on the basis of consent given by you).

II. Is there an obligation to provide data?

You are generally free to provide your data. In individual cases, there may be legal or contractual obligations to provide certain data, which we will point out to you if necessary. The provision of certain data may also be a prerequisite for the conclusion of a contract or for the initiation, establishment, execution, and termination of your business relationship with us. If you do not provide this data, you may suffer a legal disadvantage under certain circumstances. For example, without being provided with your data, we will generally have to refuse to conclude a contract or execute an order, or we will not be able to perform an existing contract or service.

III. For what purposes and on what legal basis do we process your data?

We inform you about the processing of your data in connection with the provision of product data and related service data via the Data Hub. The processing of your data can generally be based on the following legal bases:

- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, Art. 6 (1) (b) GDPR (e.g., the contract within the meaning of Art. 8 EU Data Act, which addresses the conditions under which data owners may transfer data to data recipients).
- The processing is necessary for compliance with a legal obligation to which Bentley is subject under EU law or the law of an EU Member State, Art. 6 (1) (c) GDPR (e.g. the obligation of Bentley as data holder to make available certain vehicle data and related service data in accordance with Art. 4, 5 EU Data Act, which will apply from 12 September 2025).
- The processing is necessary for the purposes of the legitimate interests pursued by Bentley or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, Art. 6 (1) (f) GDPR (e.g. the legitimate interest of Bentley in processing requests you submit to customer support).

<i>Purpose</i>	<i>Description / Examples</i>	<i>Legal basis under the GDPR</i>
Use of ONE Business ID to log in to the Data Hub	Users can log in with their ONE Business ID by using the email address and password they specified during registration. Further information can be found in the ONE Business ID Privacy Policy .	Art. 6 (1) (b) GDPR (performance of a contract) in conjunction with the contract concluded for the use of the ONE Business ID.
Processing of your requests for data to be made available to you as a user, or for data to be shared with third parties.	Registration of Bentley vehicles by the Data Hub user. Determination of the scope of the data to be made available by the user (to the user themselves or to a third party designated by the user). Making available of the requested data to the user or a third party designated by the user (in each case at the request of the user), provided that the legal requirements are met (in particular, consent has been obtained from the persons enrolled in the vehicle for the provision and/or sharing of their data).	Art. 6 (1) (c) GDPR in conjunction with Art. 4, 5 EU Data Act (legal obligation).
Enabling the persons enrolled in the vehicle to give their consent to the provision of their data to the user or to share it third parties designated by the user.	Data access requests for a vehicle may also include personal data of registered vehicle users (e.g. the primary user). The provision of this data to the requesting user requires a valid legal basis under the GDPR, generally the consent of the registered vehicle user. For this purpose, B2B users can request the necessary consent from the respective vehicle user directly via the Data Hub. The processing includes the transmission of your consent request to the relevant vehicle user, as well as the documentation of the request and consents provided.	Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of Bentley in enabling you to fully exercise your rights under the EU Data Act, while at the same time protecting the data protection rights of registered vehicle users.

Management of data provision and sharing	Requests for the provision and sharing of data made via the Data Hub can be managed in the Data Hub.	Art. 6 (1) (c) GDPR in conjunction with Art. 4, 5 EU Data Act (legal obligation) with regard to data provision and sharing requests made by the user.
Processing of support requests relating to Bentley	Processing of support requests relating to Bentley, which relate, for example, to the provision of certain data for individual Bentley vehicles.	Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of Bentley in processing the request.
Safeguarding and defending our rights or disclosure in the context of official/judicial measures	Exercising and asserting rights and claims. Disclosure in the context of official/judicial measures for the purposes of gathering evidence, criminal prosecution, and enforcement of civil law claims.	Art. 6 (1) (c) GDPR (legal obligation), insofar as processing is necessary to fulfil a legal obligation to which Bentley is subject; otherwise Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of Bentley in asserting and defending its rights and complying with legal and regulatory requirements.
Compliance with legal requirements / Processing based on legal provisions	Archiving based on statutory retention obligations. Processing of data subject requests in accordance with the GDPR. Processing of reports of potential violations of personal data protection.	Art. 6 (1) (c) GDPR (legal obligation), insofar as processing is necessary to fulfil a legal obligation to which Bentley is subject; otherwise Art. 6 (1) (f) GDPR (legitimate interest) to protect the legitimate interest of Bentley in asserting and defending its rights and complying with legal and regulatory requirements.

IV. Who receives your data?

Within Bentley, only those departments that need your data to fulfil the above-mentioned purposes will have access to it.

Your data will only be transferred to third parties if this is necessary for the aforementioned purposes and there is a legal basis for doing so or you have given your prior consent. If Bentley has commissioned service providers to process data or provide related services, the data will generally be transferred on the basis of a data processing agreement in accordance with Art. 28 GDPR or if there are professional obligations that guarantee a sufficient level of data protection. We select our processors carefully; they process personal data exclusively for the purpose of fulfilling their assignments and are contractually bound to our instructions, have appropriate technical and organizational measures in place to protect personal data, and are regularly monitored by us.

In principle, the following categories of recipients may receive data:

- Service providers/suppliers
 - Hosting service providers
 - Support service providers
 - Consulting companies/service providers
 - Technical development service providers
- Insurance companies
- Government
 - Supervisory authorities
 - Investigative authorities/courts
- Legal, economic, and financial representatives
 - Auditing companies/tax advisors
 - Lawyers/notaries
- Group companies

V. Will your data be transferred to a third country or to an international organization?

Generally, your data will only be processed within the European Union or the European Economic Area. If processing takes place in third countries (i.e. countries that are neither members of the European Union nor the European Economic Area) for which the European Commission has not determined an adequate level of data protection, e.g., by our sub(processors), Bentley will ensure that contractual, technical, and/or organizational measures are taken that are appropriate and necessary to ensure an adequate level of data protection when processing your data. This can be done in particular by concluding so-called EU Standard Contractual Clauses, which you can access [here](#). If processors or sub-processors based in the USA are certified under the EU-US Data Privacy Framework, the EU-US adequacy decision applies and the USA is considered a safe third country in this respect.

You can obtain a copy of the specific measures we have taken to ensure an adequate level of data protection from us. Please use the contact details provided in section C. II.

VI. How long will your data be stored?

We process and store your data for the purposes stated above as long as necessary. Once the purpose has been fulfilled and there are no retention obligations, the data is generally deleted. It should be noted that a business relationship is generally a permanent relationship that ends upon termination or other dissolution.

In addition, we are subject to various retention and documentation obligations, which arise from the German Commercial Code (Handelsgesetzbuch) and the German Fiscal Code (Abgabenordnung), among others. The retention and documentation periods specified therein are eight years for accounting vouchers and up to 10 years for other documents.

Finally, the storage period is also determined by the statutory limitation periods, which, for example, according to Sec. 195 et seq. of the German Civil Code (Bürgerliches Gesetzbuch), can generally be three years, so that we store the relevant data for up to four years, taking into account the year in which the claim may have arisen.

C. Data protection officer and rights of data subjects

If you have any general questions about this privacy notice or wish to receive further information on the processing of your data by Bentley, you can contact our **data protection officer**:

- Post: Bentley Motors Limited, Data Protection Officer, Pym's Lane, Crewe, Cheshire, CW1 3PL, England
- Email: DPO@bentley.co.uk
- Phone: +44(0)1270255155

I. What are your rights?

You have the following rights vis-à-vis us, subject to the respective legal requirements:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR).

Right to object

You have the right to object to the processing of your data

- if the processing is carried out for direct marketing purposes (including profiling for direct marketing purposes) or
- if the processing (including profiling) is necessary for the purposes of the legitimate interests pursued by us or by a third party (Art. 6 (1)(f) GDPR) or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us (Art. 6 (1)(e) GDPR). In the event of such an objection, we ask you to inform us of the reasons for your objection to the processing of your data. In the event of your objection, we will no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Please send your objection and, if necessary, the reasons for it to Bentley using the contact details

Furthermore, you have the right to contact a data protection supervisory authority at any time in accordance with Art. 77 GDPR if you believe that the processing of your data violates applicable law. The address of the data protection supervisory authority responsible for Bentley is:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, SK9 5AF, England

However, you may also lodge a complaint with any other data protection supervisory authority within or outside the EU, in particular with the supervisory authority in the Member State of your habitual residence, your place of work or the place of the alleged infringement. The contact details of national data protection supervisory authorities in all EU Member States can be found at the following link:

https://edpb.europa.eu/about-edpb/board/members_en.

II. Exercising your rights as a data subject

If you wish to exercise your rights as a data subject, please use our data protection portal:

<https://datenschutz.volkswagen.de>.

You can also send your request using the following contact options:

- Email: DPO@bentley.co.uk
- Post: Bentley Motors Limited, Data Protection Officer, Pym's Lane, Crewe, Cheshire, CW1 3PL, England
- Phone: +44(0)1270255155

III. Exercising your rights under the EU Data Act

The types of data concerned and your rights differ depending on whether the GDPR or the EU Data Act applies. To exercise your rights under the EU Data Act, please use our dedicated [Data Hub](#), to which this privacy notice applies and which has been specifically designed to handle EU Data Act requests. Please note that requests regarding data under the EU Data Act cannot be processed via our contact channels for data protection requests (in particular our data protection portal) listed under C.II.

D. Amendments to country-specific data protection regulations

Please note that the data protection level of GDPR, as described above, represents the baseline requirements. If country-specific data subject rights apply or further information on data processing or contact persons are required, you will find these in the following country-specific additions.

France

To the extent that the access to the data and the data processing fall within the scope of the data protection laws of France, you also have the right to define directives concerning the fate of your personal data after your death (post-mortem right).

Spain

To the extent that access to and processing of data falls within the scope of data protection laws of Spain, please note that your personal data will be deleted after the statutory retention period has expired if the legal basis for processing your personal data no longer applies (in particular if you withdraw your consent), if the processing of your personal data is no longer necessary for the respective purpose or if the purpose itself no longer applies.

Status of the Privacy Notice: September 2025