



 **GSP**
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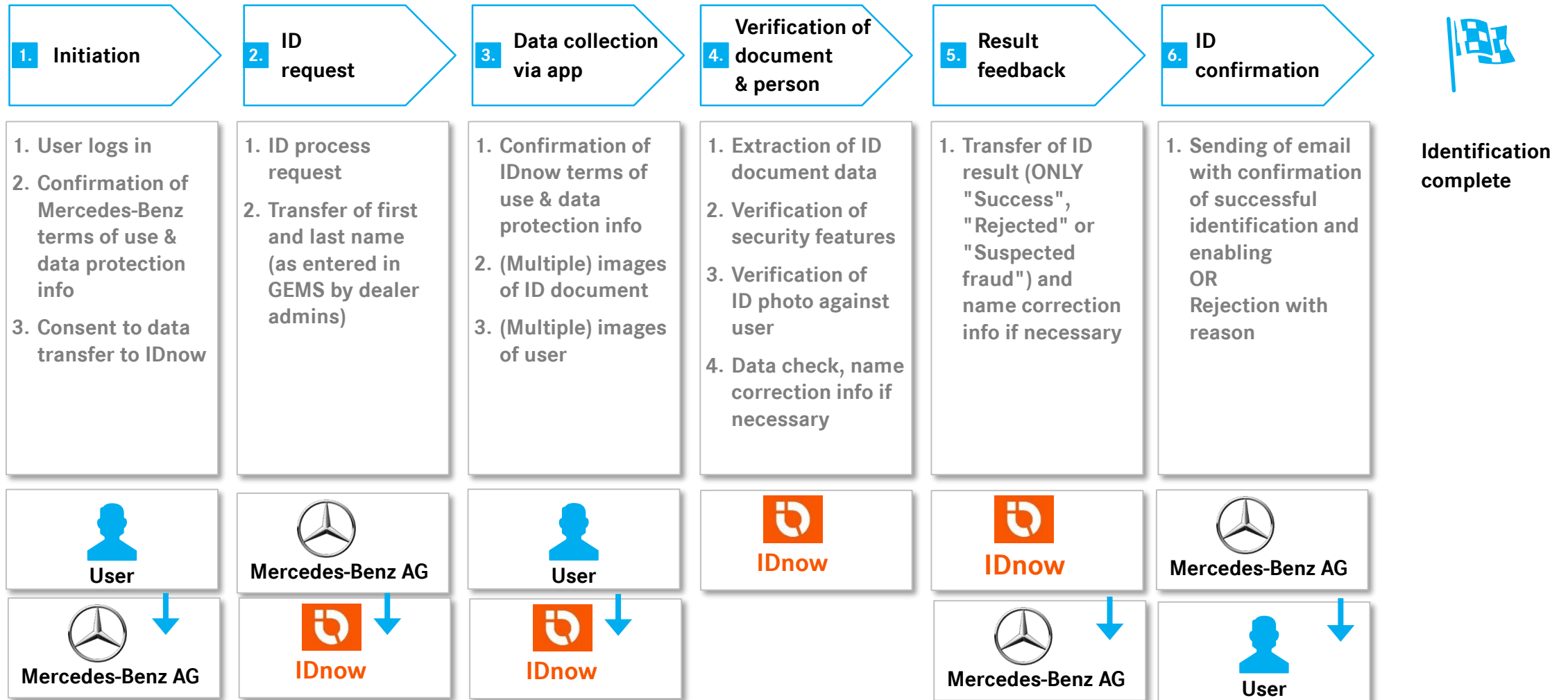
IDnow Identification Process : Information about Data Processing and Data Protection

GSP/ORE

Mercedes-Benz
Das Beste oder nichts.



Data processing as part of the new identification process based on the smartphone app "IDnow Auto-Ident"



* Process steps 3 and 4 are presented as logical units to simplify understanding. They are technically implemented in a different order.

** In cases of suspected fraud or for support requests, Mercedes-Benz AG can request the full data record compiled by IDnow in isolated cases.

Which data are collected, processed and transferred - both specifically and in a legal sense?

- **Mercedes-Benz AG transmits the following to IDnow GmbH to initiate the identification process:**
 - First name and surname
 - Transaction ID (randomly generated ID to manage the process at Mercedes-Benz AG)
- **The app "collects" the following data in a legal sense and transfers it from the user to IDnow GmbH:**
 - (Multiple) images of the ID document for the purpose of data extraction and verification of security features
 - (Multiple) images of the person to compare the ID photo against the person and verify that it is a "living" person
 - Timestamp of identification process
- **In order to verify that the document and person are genuine, the following data are extracted from the images by IDnow GmbH (if available):**
 - First name and surname
 - Date and place of birth
 - Issuing country/authority and type of ID document (passport/identity card/driving licence)
 - Date of issue and validity
 - ID document number
- **IDnow GmbH transfers the following data to Mercedes-Benz AG as the result:**
 - Result of identification in the form of a status of "successful", "successful with name correction", "rejected" or "suspected fraud"
 - Only in event of name correction: First name and surname as per ID document
 - A unique, anonymized and non-traceable hash-ID made up of "issuing country", "ID document type" and "ID document number"
 - Transaction ID (randomly generated ID to manage the process at Mercedes-Benz AG)
 - Identification ID (randomly generated ID to manage the process at IDnow GmbH) and timestamp of identification process

Which data are stored?

For what purpose? By whom? For how long?

- **Mercedes-Benz AG stores the following data for as long as the user has access to the Daimler systems. These data are only deleted together with deletion of the user ID.**
 - First name and surname
 - A unique, anonymized and non-traceable hash-ID made up of "issuing country", "ID document type" and "ID document number" for the purpose of detecting "duplicate" users in the user management systems of Mercedes-Benz AG
 - Transaction ID (randomly generated ID to manage the process at Mercedes-Benz AG)
 - Identification ID (randomly generated ID to manage the process at IDnow GmbH) and timestamp of identification process
- **The following data and images received, collected, extracted and verified by IDnow GmbH are only stored if the identification process is completed in full. These data may only be used for the purpose of verification and are deleted after 90 days.**
 - (Multiple) images of the ID document for the purpose of data extraction and verification of security features
 - (Multiple) images of the person to compare the ID photo against the person and verify that it is a "living" person
 - First name and surname
 - Date and place of birth (if available)
 - Issuing country/authority and type of ID document (passport/identity card/driving licence)
 - Date of issue and validity (if available)
 - ID document number
 - Result of identification in the form of a status of "successful", "successful with name correction", "rejected" or "suspected fraud"
 - Only in event of name correction: First name and surname as per ID document
 - A unique, anonymized and non-traceable hash-ID made up of "issuing country", "ID document type" and "ID document number"
 - Transaction ID (randomly generated ID to manage the process at Mercedes-Benz AG)
 - Identification ID (randomly generated ID to manage the process at IDnow GmbH) and timestamp of identification process

Who can access the personal data collected by IDnow GmbH?

- **Mercedes-Benz AG has commissioned IDnow GmbH to verify users who request "particularly sensitive" access to Daimler systems.** The data processing activities have been outsourced for this use case. **IDnow GmbH is not permitted to use the personal data in any other way, including in anonymized form.**
- **Mercedes-Benz AG normally only has access to the information stored at Mercedes-Benz AG.** In this case, access is limited to a number of strictly essential people at Mercedes-Benz AG or third parties commissioned by Mercedes-Benz AG (e.g. in support).
- **Mercedes-Benz AG only reserves the right to access the collected data in two special cases:**
 - **Support case:**

In cases where a user is unable to identify themselves despite multiple attempts and the reasons for the rejection are not evident without further research, Mercedes-Benz AG can request to view the collected data and use it solely to provide qualified feedback in support. The user must have submitted a support request for this purpose.
 - **Suspected fraud:**

In cases of suspected fraud, Mercedes-Benz AG can request to view the data from identification processes classified accordingly and initiate technical and/or legal actions on this basis. Only in this case are the collected data stored by Mercedes-Benz AG as evidence and, if necessary, also stored for longer than 90 days. These data will also be immediately deleted by Mercedes-Benz AG upon conclusion of the case at the latest.
- **Irrespective of these cases, the data retention period of IDnow GmbH is always 90 days.**

This also means that Mercedes-Benz AG only has a period of 90 days to request the collected data.

For which purpose are these data collected?

And does the collection comply with the EU-GDPR?

- **The objective of Mercedes-Benz AG with this new security concept is to ensure the security of our vehicle customers and their data, as well as to protect our dealers (incl. their service technicians) and Mercedes-Benz AG against wrongful demands as a result of illegal tampering.**
- Alongside modern protection measures within the vehicles themselves, there is also a need to provide appropriate protection with respect to the issuing of access rights to the vehicle and central systems.
- **The main aim of this verification is to ensure that users are actual identifiable and living persons. The use of fictitious or multiple users is not permissible and this identification process aims to prevent such practices.**
- Within this framework, Mercedes-Benz AG only collects personal data to the extent required and only for the purpose of preventing illegal access or improper tampering and/or making such activities traceable. In the process, Mercedes-Benz AG takes into account the balance between its overall aim and the collection of personal data.

What will the personal data definitively not be used for? What types of data use are strictly prohibited?

- **Mercedes-Benz AG and its national representatives do not store any of the additional personal data collected for verification.**
- **IDnow GmbH does not permanently store any data centrally.
All collected data are definitively deleted after 90 days.**
- The personal data may only be used for verification purposes and not for analysis for statistical or marketing purposes.
- Neither Mercedes-Benz AG, nor its national representatives, nor IDnow GmbH are permitted to use the additional personal data collected for **any** background checks against central databases (e.g. police databases, population databases) or social media (e.g. Facebook)
(Sole exception: Cases of suspected fraud).



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