

Policy	LKQ Europe Privacy Notice		
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LKQ PRIVACY NOTICE

Last updated 1 August 2023

LKQ Corporation and its affiliates respect your concerns about privacy and your right to know how your personal data is collected and processed. References in this Privacy Notice (the "Notice") to "LKQ", "we", "us", and "our" are references to the entity responsible for the processing of your personal data, which generally is the entity that obtains your personal data. To find the LKQ location nearest you, please visit the LKQ Location Finder <u>https://www.lkqcorp.com/location-finder/</u>.

This Notice applies to the personal data we collect through our websites, mobile applications, social media pages, and offline collection methods that reference this Notice (collectively, the "Services").

This Notice describes how the Services collect information from you, what types of information it collects, how we may use the personal data, with whom we may share it, the measures we take to safeguard the personal data we obtain, how you may exercise your rights regarding our processing of your personal data, and how you can contact us regarding our privacy practices.

The Services may provide links to other third-party websites and features, or contain third-party cookies, that are not owned or controlled by us. Please review the privacy notices of these third parties to familiarize yourself with their privacy practices. You may also exercise your choices regarding third-party cookies using our Cookie Consent Management Tool by clicking on the Cookie icon/Cookie link at the bottom of the LKQ website you are visiting.

By using the Services, you acknowledge you have read and understood the terms of this Notice. Please fully review this Notice before you use the Services or submit information to us.

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1. PERSONAL DATA WE COLLECT

We may collect certain personal data about you in order to provide and improve the Services. More specifically, the following are the categories of personal data we may have collected about you over the last 12 months:

- Contact information including name, job title, business name, phone and fax number, email and postal address for you or for others (e.g., principals in your business)
- Information used to create your online account (such as username, password, favorite store and security question and answer)
- We collect and store the information that you and other users provide when you and they use and interact with the Service (such as your favorite store locations, branch or your vehicle information)
- Purchase and customer service history
- Financial and tax information, including name, billing address, payment card details (i.e., card number, expiration date and security code), tax related information (e.g., business tax ID and VAT ID), credit screening and bank account information
- Location data (i.e., data derived from your IP address, country and zip code)
- Precise geolocation data, for which we will provide notice and choice prior to collection to the extent required by law
- Usage data including details on your browser (such as type, version, language); operating system and interface; website from which you are visiting us (referrer URL); webpage(s) you are visiting on our website; date and time of accessing our website and time zone difference; access status/HTTP status code; volume of data transferred; internet protocol (IP) address; and information gathered via cookies
- Correspondence-related data such as emails, texts, letters, or responses to surveys and questionnaires; information you provide us by phone or live chat; or your feedback on your experience with the Services, or an LKQ facility
- Other personal information (i.e., date of birth, place of birth, citizenship, age)

Please note that providing personal data to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Services.



2. HOW WE COLLECT PERSONAL DATA

We collect personal data in a few ways:

2.1. Information you give us.

We collect information that you elect to share with us, for example, when you sign up for a newsletter, respond to a survey or fill out a form, register for a product warranty, sign up for a loyalty program, create an account to access the Services, visit our stores, attend one of our events, enter into a contest or sweepstakes, place an order, provide a reviews, contact customer service, or make a purchase.

2.2. Information obtained when you use the Services.

We collect certain information from you through your use of the Services, such as usage data and location data (i.e., such as data derived from your IP address, country and zip code). We may also collect generic network information and aggregated data in relation to how you use the Services in order to assess and improve functionality of the Services.

2.3. Information provided by third-parties.

We may obtain data about you from third parties who help us provide the Services to you. For example, we may obtain information about your order or product return from our order fulfillment and delivery partners, and garages that service your vehicles may provide vehicle service and repair information. We may also obtain data about you from third party credit reference agencies if we conduct a credit check. In these instances, please refer to the relevant third party's privacy notice to understand how they handle your personal information.

We also use third-party web analytics services in connection with the Services, which use cookies and similar technologies to collect data (such as IP addresses) to evaluate use of and interaction with the Services. To learn more about these analytic tools and how to opt-in/opt-out, please click on our Cookie icon/Cookie link at the bottom of the LKQ website you are visiting.

3. COOKIES AND SIMILAR TECHNOLOGIES

Like most companies, LKQ uses cookies and similar technologies ("cookies") in the Service to personalize and enhance your experience with our Service. We and third-parties with whom we partner (including Google Analytics) may use cookies, web beacons, tracking pixels, web bugs, scripts, tags, and other similar technology (collectively, "Cookies") to record information about your activities on our websites and on third-party websites that you visit.

3.1. Cookies. A cookie is a small text file that is stored on a device for record-keeping purposes. Cookies record information about your activities while using a websites and "remember" you when you return to the website. Some cookies remain on your device until you delete them. Others, like session ID cookies, expire when you close your browser. You may set your device settings to attempt to reject cookies, but doing so may affect functionality of the Services. Information collected by cookies may include, but is not limited to: your IP address, browser



type and language, device type, device identifiers, other device and software information (such as configuration information on your device and other applications), apps you access, search and browsing information, web usage information, referring/exit pages and URLs, other browser history, platform type, number of clicks, landing pages, cookie information, the pages you requested and viewed, the amount of time spent on particular pages and the date and time of each request you make.

- **3.2. Pixels.** Pixels (aka web beacons) are tiny graphics with a unique identifier that are used to track the online movements of web users. Unlike cookies, which are stored on a computer's hard drive, pixels are small graphics that are about the size of the period at the end of the sentence that are embedded invisibly on web pages or in HTML-based emails. We do not control the use of pixels by third-parties.
- **3.3. Making cookie choices.** Except for cookies that are essential to the operation of the website you are visiting, you can choose what cookies you will accept. To view the cookies used on the LKQ website you are visiting and make choices about those cookies, please click on the Cookie icon/Cookie link at the bottom of that site. By refusing to accept cookies, you may not be able to use some of the features and functionality available through the Services.
- **3.4.** Sharing tools. To enhance your experience when using the Services, we sometimes embed content and sharing tools from other third-party sites, such as "like" buttons from social networking sites; these third-party sites may also place and access cookies on your device. LKQ does not control the placement or access of these third-party cookies. Please review the privacy notices of these third parties to familiarize yourself with their practices.
- **3.5. Google Analytics.** Google, a third-party analytics provider, may collect information about our website usage and users of the Services to the extent the website uses Google Analytics. Google may use cookies and pixels to collect usage information from users that visit the Services, including information about the pages where users enter and exit the Services, what pages users view on the Services, time spent on each page, browser version, operating system, internet protocol address, and geolocation information. These technologies allow Google to recognize a user when a user visits the Services and when the user visits other websites. Google aggregates the information it collects from the Services and from other websites and shares the aggregated information with us and other website operators, including but not limited to age range, gender, geographic regions, general interests and details about devices used to visit websites and purchase items. For more information regarding Google's collection methods and use of information, see the Google Privacy Policy by visiting the following link: https://www.google.com/intl/en/policies/privacy/. To manage your Google Analytics tracking choices, please visit the following link: https://tools.google.com/dlpage/gaoptout. You may also understand whether and how we use Google and exercise your choices by clicking on \setminus Cookie icon/Cookie link at the bottom of the page, depending on the website you are visiting.

We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other



third-party cookies together to inform, optimize, and display ads based on your past visits to the Services. You may control your advertising preferences for certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at https://google.com/ads/preferences, or by visiting NAI's online resources at http://www.networkadvertising.org/choices.

- **3.6.** About "Do Not Track". As discussed above, because we and our third-party service providers automatically collect service usage information through the use of cookies, your selection of the "Do Not Track" option provided by your browser may not have any effect on our collection of automatically collected information. One way to attempt to "opt out" of the collection of any information through cookies and some (but not all) other tracking technology is to actively manage the settings on your browser to delete and disable cookies and other tracking/recording tools. However, getting a "Do Not Track" signal to work as you might want is difficult and may not be possible. Using browsers as an example, not all tracking technologies can be controlled by browsers; unique aspects of your browser might be recognizable even if you disable a tracking technology; not all settings will necessarily last or be effective; even if a setting is effective for one purpose, data still may be collected for another; and even if one website observes a "Do Not Track" signal, that website usually will not be able to control other websites. Additionally, if you select a "Do Not Track" option or disable cookies on your device, the Services may not function properly.
- **3.7. Online Ads**. To learn more about interest-based advertising and how you may be able make choices on some of this advertising, you may wish to visit the European Interactive Digital Advertising Alliance (EDAA), at https://youronlinechoices.eu/. You may also be able to limit interest-based advertising through the settings menu on your mobile device by selecting "limit ad tracking" (iOS) or "opt-out of interest-based advertising served by mobile ad networks by visiting http://youradchoices.com/appchoices and downloading the mobile AppChoices app.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from EDAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the EDAA's Principles.

If you are located in the EEA, UK, or Switzerland, you may take advantage of <u>Your Online Choices</u> (<u>https://youronlinechoices.eu/</u>). This service allows you to select tracking preferences for most of the advertising tools. As such, it is recommended that you make use of this resource in addition to the information provided in this document.



4. HOW WE USE PERSONAL DATA

We do not sell personal data and do not disclose personal data about you except as described here or at the time of collection. We may use the personal data we obtain as follows:

- **4.1.** Provide and administer our products and services;
- 4.2. Process and fulfill orders and keep you informed about the status of your order;
- **4.3.** Communicate about and administer our products, services, events, programs and promotions (such as by sending alerts, promotional materials, newsletters and other marketing communications);
- **4.4.** Conduct and facilitate surveys, sweepstakes, contests, focus groups and market research initiatives;
- **4.5.** Perform data analytics (such as market research, trend analysis, financial analysis and customer segmentation);
- 4.6. Provide customer support;
- **4.7.** Process, evaluate and respond to requests, inquiries and applications;
- **4.8.** Create, administer and communicate with you about your account (including any purchases and payments);
- 4.9. Provide investor services;
- **4.10.** Conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- **4.11.** Operate, evaluate and improve our business (such as by administering, enhancing, and improving our products and services; developing new products and services; managing our communications and customer relationships; and performing accounting, auditing, billing, reconciliation and collection activities);
- **4.12.** Verify your identity and protect against and prevent fraud and other unlawful activity, unauthorized transactions, claims and other liabilities, and manage risk exposure and quality;
- **4.13.** Conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms; and
- **4.14.** Maintain and enhance the safety and security of our products, services, information resources and employees.



- **4.15.** We may anonymize or aggregate personal data and use it for the purposes described above and for other purposes to the extent permitted by applicable law. We may also use personal data for additional purposes that we identify at the time of collection. We will obtain your consent for these additional uses to the extent required by applicable law.
- **4.16.** Where required by applicable law, we will obtain your consent for the processing of your personal data for direct marketing purposes.
- 4.17. The legal basis for LKQ processing your personal data as described above will typically be one of the following: (1) your consent; (2) performance of a contract with you or a relevant party; (3) our legitimate business interest (e.g., managing our business and improving the services); or (4) compliance with our legal obligations.

5. HOW WE SHARE INFORMATION

We may share your personal data to (internal and external) recipients for the processing purposes described above.

- **5.1. Within LKQ**: Depending on the categories of personal data and the purposes for which the personal data has been collected, different internal departments within LKQ may receive it (for example, our IT department may have access to usage data; our sales departments may have access to account and order data). Moreover, other LKQ departments may have access to certain personal data about you on a need to know basis, such as the legal department, the finance department or internal auditing.
- **5.2. Sharing with Other Users**. The Services may allow users to connect and communicate with others, such as through a message board. If you use any communication features, other users of the Services may be able to view your profile information and your communications that you post to the Services.
- **5.3. Service Providers.** We use third parties to help us operate and improve the Services (e.g., hosting providers, e-commerce service providers and analytics service providers). We may provide these third parties with information we collect and they may collect information from you and about your use of the Services. The processing by these third parties will, unless specifically noted otherwise in this Notice, be governed by a contractual agreement requiring them to process the personal data solely on behalf of LKQ when performing the Services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of LKQ.
- **5.4. Insolvency and Business Transitions.** If we ever file for bankruptcy or engage in a business transition such as a merger or joint venture with another company, or if we purchase, sell, or reorganize all or a part of the Services or our business or assets or the business or assets of our



affiliates, we may disclose your personal data, including to prospective or actual purchasers in connection with one of these transactions.

- **5.5. Regulators, authorities and other third parties.** We may also transfer your personal data to governmental agencies and regulators (e.g. tax authorities), courts, government authorities, and independent external advisors acting as controllers (e.g., lawyers, accountants, auditors etc.) all in accordance with applicable law.
- **5.6. Garages.** We may share your personal data with garages that service your vehicle and/or provide services to you, for example in order to fulfil your contract with that third party. Please refer to the relevant third party's privacy notice to understand how they handle and process your personal data.
- **5.7. Suppliers.** We may share certain personal data with our suppliers, for example in relation to claims and complaint management and customer bonus or incentive programs where necessary in order to operate those programs.
- **5.8. Third Party Social Media Platforms.** We may share certain personal data with third parties such as social media platforms where necessary for the purposes of features or functions incorporated into our Services which are provided by such third parties. Please refer to the relevant third party's privacy notice to understand how they handle and process your personal data.

6. DATA TRANSFERS

We may transfer the personal data we collect and may store such information outside the country in which the information was provided. These countries may have different data protection laws than the country in which the information was provided. If we do so, we will take necessary measures to ensure that such transfers are adequately protected as required by applicable data protection law, including adequacy decisions, relevant government treaties and the Standard Contractual Clauses approved by the European Commission.

7. HOW WE PROTECT PERSONAL DATA

We maintain administrative, technical and physical safeguards, consistent with legal requirements where the personal data was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal data provided to us through the Services.

8. YOUR RIGHTS

If you have an account with us and would like to update your personal data associated with your account, you may make changes in the "My Profile" or "Settings" portions of the Services. Aside from updates you make, at any time, you may challenge the accuracy or completeness of your personal data in our records. If you successfully demonstrate that your personal data in our records is inaccurate or



incomplete, we will update the personal data as required. Where appropriate, we will transmit the updated information to third parties having access to your personal data.

If you would like to cancel your Account, request access or a correction to your personal data (other than corrections you can make in the "My Profile" or "Settings" portions of the Services), please contact us using the "Contact Us" feature within the Services. If you do not want your information accessed or stored as described in this Notice, you should not access, use, or register an Account with the Services.

To the extent provided by the law of your jurisdiction, you may also have the following rights:

- **8.1. Right to withdraw your consent.** If you have given your consent regarding certain types of processing activities (in particular regarding the receipt of certain direct marketing communications), you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent by clicking on the withdraw option in relevant communication or by contacting your relationship manager (for existing customers).
- **8.2.** Access. If provided by applicable data protection law, you have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes but is not limited to the purposes of the processing, the categories of personal data concerned, the source of the personal data, and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access. You may also have the right to obtain a copy of the personal data undergoing processing free of charge.
- **8.3. Correction.** Where provided by applicable data protection law, you have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **8.4. Deletion.** Where provided by applicable data protection law, you have the right to request deletion of personal data concerning you and we are obliged to delete such data, except where retention is required by contract, in the context of a legal dispute or other legal retention requirement, or as otherwise permitted by applicable law.
- **8.5. Restriction.** Where provided by applicable data protection law, you have the right to request the restriction of processing of your personal data (for example, where the accuracy of the personal data is contested). In this case, the respective personal data will be marked and may only be processed by us with your consent or for certain purposes.
- **8.6.** Portability. Where provided by applicable data protection law, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that personal data to another



entity without hindrance from us, where the processing is carried out by automated means and is based on consent or contract.

8.7. Objection. Where provided by applicable data protection law and under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your data by us and we are required to no longer process your data. Such right to object especially applies if we collect and process your data for direct marketing purposes. If you have a right to object and if you exercise this right, your data will no longer be processed for such purposes by us, except where required by law, where we demonstrate a compelling legitimate grounds for the processing that overrides your interests or fundamental rights and freedoms or for the establishment, exercise or defense of legal claims.

To exercise your rights, please contact us by using the contact information at the end of this Notice. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity, including by asking you for additional information. If you would like to use an agent, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

Additionally, to the extent the European Union General Data Protection Regulation (GDPR) applies, you also have the right to lodge a complaint with the competent data protection supervisory authority in the relevant Member State (e.g., the place where you reside, work, or where an alleged infringement of the GDPR took place).

9. DATA RETENTION

We retain personal data only for as long as is reasonably necessary to fulfil the purpose for which it was collected. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax and accounting requirements set by a legislature, regulator or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting and other applicable obligations.

Therefore, we retain personal data for as long as the individual continues to use our services for the purposes explained in this Privacy Notice and/or at the time of collection. When an individual discontinues the use of our services, we will retain their personal data for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices they have made, such as to receive marketing communications. In particular, we will retain personal data supplied when joining our services, including complaints, claims and any other personal data supplied during the duration of an individual's contract with us for the services until the statutory limitation periods have expired, when this is necessary for the establishment, exercise or defense of legal claims.



Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

10. ADDITIONAL INFORMATION

- **10.1. Children.** The Services is intended for users over the age of 18 and is not directed to children under 13. We do not knowingly collect personal data from children under 13. If you become aware that a child has provided us with personal data without parental consent, please contact us by using the contact information at the end of this Notice, and we will take steps to remove the information and terminate the child's account.
- **10.2. Modification of this Notice.** We will occasionally update this Notice, in our sole discretion. When we post changes to this Notice, we will revise the "Last updated date" at the top of this Notice in order to notify you of changes. We recommend that you check the Services from time to time to inform yourself of any changes in this Notice or any of our other policies. If you do not agree to any update, please do not use the Services; by continuing to access or use the Services after a change to this Notice becomes effective, you agree to and accept the revised Notice as of the "Last updated date".



11. HOW TO CONTACT US

If you have questions, concerns or complaints regarding your existing account please contact us using the "Contact Us" feature within the Services.

If you have questions, concerns or complaints about our privacy practices, please contact our Privacy Office at:

privacy@lkqeurope.com

or

LKQ Europe GmbH Zählerweg 10 6300 Zug Switzerland Attn: Head of Data Privacy

For Germany, you can contact our German Data Protection Officer

datenschutz@stahlgruber.de

or

LKQ German Holdings GmbH c/o Datenschutz Gruber Str. 65 85586 Poing

To find the LKQ location nearest you, please visit the LKQ Location Finder <u>https://www.lkqcorp.com/location-finder/</u>.