

Privacy Policy

This Privacy Policy ("Privacy Policy") applies to the collection and processing of [Personal Data](#) carried out by LPMI as Data Controller for the purposes described in the "Why we collect and process your Data" section below.

This Privacy Policy is drafted pursuant Article 13 of the EU Regulation 679/2016 (hereinafter "GDPR") and will help you understand how we handle your information.

In this document, you will find some examples of how we process [Personal Data](#), and (at the end of this Privacy Policy) [Definitions](#) which include more detailed explanations for capitalized terms used. If you would like any clarification regarding this Privacy Policy or how your data are processed, please send your request to: dpo-lpmi@leapmotor-international.com.



1. Who we are

The independent [Data Controller](#) of your [Personal Data](#) is Leapmotor International B.V., located in Taurusavenue 1, 2132LS Hoofddorp, the Netherlands, ("LPMI"). LPMI is referred to as the "[Data Controller](#)" or "[we](#)" or "[us](#)".



2. What data we collect and process

We collect data from [Our Website](#) and [Application](#), during [Our Events](#) and otherwise when you interact with us. Data collected and the purposes it is processed for vary depending on how you use our [Services](#) and how you manage the settings of your [Browser](#), [Device](#) and the [Application](#) you are using. You can find further details on the purposes we process your [Personal Data](#) for, in the "Why we collect and process your Data" section below.

Data provided by you

We collect [Personal Data](#), either directly from you (e.g. via tablet or forms we provide) or indirectly via [Our Network](#) and/or [Partners](#). These are mostly contact details and identification data such as name, surname, date of birth, e-mail address, place of residence, telephone number, occupation, interests, needs, details about the ownership of vehicle, preferred language and brands. Sometimes the data you provide may relate to third parties. If you provide us with the data relating to third parties, you are responsible for sharing such information with us and must be legally authorized to do so (i.e. you must either be authorized by the third party to share their information, or it must be necessary for some other legitimate reason). You must also fully indemnify us against any complaints, claims or demands for compensation of damages which may arise from the processing of third-party [Personal Data](#) in violation of applicable data protection law.

We do not collect information relating to the sale of a Vehicle or fleet (for example, bank details, invoicing data, or whether you have applied for financing). All legally required sales data and related information are processed by [Our Network](#) (who will provide you with their privacy policy). Retailers in [Our Network](#) act as independent Data Controllers of your data) or the third party who sold you the Vehicle.

Data collected by the Browser, Device and the Application

When you use [Our Website](#) and [Application](#), we collect information on the [Browser](#), the [Device](#) and the [Application](#) you are using. This information includes your [IP Address](#), the date, time and the requested URL, the [Unique Identifiers](#) and other information such as the type of your [Browser](#) or [Device](#). Information relating to your [Browser](#) or [Device](#) may include your operating system, language, network settings, telephone operator or internet provider, installed third-party applications and plug-in lists.

Some of this information is collected using [Cookies](#) and [Other Tracking Technologies](#) that are on your [Browser](#) or [Device](#). This helps us to avoid disruption during the provision of the [Services](#) and allows us to provide you with [Content that may be useful to you](#). More information on cookies can be found in our Cookie Policy.

Registration data and access to the Connected Services (if applicable)

When you register to access [Connected Services](#), we will ask you to enter or confirm some [Personal Data](#) such as your e-mail address, and mobile phone number, as well as other information such as the answer to a security question and a PIN code, in order to help us establish your identity when accessing services from the [Vehicle Device](#) or [Our Websites](#) and [Application](#).

Vehicle Data (if applicable)

When you purchase a Vehicle and you use the [Connected Services](#), the data identifying it (for example, the Vehicle Identification Number or VIN, the license plate, etc.) together with Vehicle Data will be linked to your Personal Data, becoming one of your [Unique Identifiers](#). We may then remotely collect more detailed and accurate [Vehicle Data](#), such as driving data (e.g. location, speed and distances), engine running time and turning off time, if the battery cable is cut, battery diagnostics, movements with the key out, presumed collision, as well as diagnostic data such as, but not limited to, oil and fuel levels, tyre pressure, and engine status.

This [Vehicle Data](#) is linked to you to using a [Unique Identifier](#) such as the Vehicle Identification Number or VIN, or your [Connected Services](#) account.

Vehicle Device Data (if applicable)

Through the [Vehicle Device](#), we may provide information on battery status, on the use of native applications installed on the [Vehicle](#), as well as on mobile network connection, such as, for example, when you connect the [Device](#) to provide the [Vehicle](#) data connection.

Information about your location

We collect information about your location in order to allow you to view [Our Network](#) near you, as part of our [Services](#), and to provide you with [Content that may be useful to you](#). Your location can be determined through:

- manually entering an address, city or zip code;
- the sensors on your [Device](#);
- your [IP Address](#) collected through the permission of you [Browser](#) or [Device](#).

Your location is determined more or less accurately and consistently depending on whether it is collected by the [Browser](#) or [Device](#) and on the privacy settings you have set on them. We make every possible effort to ensure that Information on your location is not used to infer your [Sensitive Data](#).

You can limit our collection of your position by changing your [Browser](#) or [Device](#) settings, as set out in the "How to control your Data and manage your choices" section below.

Data inferred by your activity

We collect information about you when you interact with our [Services](#) and we use this to improve our [Services](#) (e.g., if we see that you are interested in a particular vehicle model, to organise and manage [Our Events](#), or in periodic vehicle check-ups in a given geographical area, we will focus on providing you with such content) and understanding the [Content that may be useful to you](#).

In other cases, if you contact us by email, post, telephone or otherwise regarding the [Vehicles](#) or request other information, we collect and maintain a record of your contact details, communications and our responses. If you contact us by telephone, more information will be provided during the call and calls may be recorded for training and monitoring purposes.



3. Source of Personal Data

a) Data received from third parties

To the extent permitted under applicable data protection law, we may collect:

- Data provided by you to [Our Network](#)
- [Vehicle Data](#) provided by you to [Our Network](#) and/or [Car Manufacturer](#) (if applicable). This is the case of [Vehicle Data](#) following a service entry or a service provided by the latter.

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- Feedback provided by you to LPMI following the provision of services by [Our Network](#) and/or our Services (e.g., after sales and after service feedback)

b) Data collected by Our Partners' Websites and Apps

We also collect information about you from [Our Partners' Websites and Apps](#). Our [Partners](#) may provide your [Personal Data](#) to us only after they have contractually assured us that they have obtained your consent or that they have another lawful basis for sharing it (for example, if you ask one of our [Partners](#) to book a test drive, when you purchase a Vehicle or when you request to receive marketing communications). This practice will be referred to below as "**Indirect Collection**". Please be assured that, before receiving your [Personal Data](#), we take steps to verify that [Partners](#) can lawfully share your [Personal Data](#) with us and that we can process it.

c) Data collected from public or publicly accessible sources

To the extent permitted under applicable data protection law, we may collect or enrich your [Personal Data](#) with information obtained from public sources such as public registers, online newspapers, lists or public directories. Please note that, before receiving your [Personal Data](#), we will take steps to verify that we can use this [Personal Data](#) for our intended purposes.



4. Why we collect and process your Data and legal basis

Your Data will be used for the following purposes:

a) Ease the collection and correction of your Data

To the extent permitted under applicable data protection law we use your Data, especially the Data provided by you to [Our Network](#), to update the information that we have about you as an owner of one of our [Vehicles](#) or as a person interested in our brands. We will also share this updated information with [Our Network](#) to make sure your [Personal Data](#) are correct and kept up to date.

This processing is necessary in our legitimate interest in maintaining the quality of [Personal Data](#) we hold about owners and leads.



b) Providing our Services and related support

We use your Data to offer you our [Services](#), including to book test drives on [Our Website](#) and [Application](#); to organize and manage [Our Events](#) and to respond to your requests/suggestions/reports.

This processing is necessary to perform our contractual obligations to you or take steps with a view to entering into a contract with you.

c) Sending you promotional communications

LPMI may use your contact details (e-mail, phone, SMS and/or any other available means) to send marketing communications or to perform market research and customer surveys. These communications might relate to all LPMI current and future brands. We will not contact you for marketing purposes unless you consent to receiving it.

In some cases, communications may include product or service promotions from selected [Partners](#). When LPMI sends out this type of communication, it may act as [Joint Data Controller](#) with the relevant [Partners](#). Specific information and agreements will be in place with [Our Partners](#) before sending of any third party marketing communication to you and you will not receive third party marketing unless you asked to receive it through specific *tick-boxes*.



d) Detecting anomalies in the Services and in the assistance from Our Network

If you have participated in our surveys or if you have spontaneously shared with [Our Network](#) feedback in relation to our [Services](#), we will use and share that information with relevant stakeholders to improve your experience and our [Services](#).

This processing will be necessary, where applicable, in our legitimate interest to scrutinise and improve the operations of [Our Network](#) and [Car Manufacturer](#). You will not receive any communications of this nature, unless in response to your feedback, or if you have consented to receiving promotional communications, in which case we will take the initiative to ask your opinion.



e) Excluding you from irrelevant marketing communications

LPMI may process your Data to exclude you from marketing communications, where such communications are not consistent with your profile (e.g.: if you are based in Italy, we will not share promotions pertaining to France, etc).

This processing is necessary in our legitimate interest in ensuring that we make effective use of our marketing budget and in your legitimate interest in not receiving communications which are irrelevant or unlikely to be of interest to you.

f) Analysing your preferences and behaviours in order to customize our Services and communications, including any Content that may be useful to you

LPMI uses your Data, in particular Data inferred by your activities, [Vehicle Data](#) (if applicable) and [Aggregated Information](#) to improve our Services and marketing communications, commercial initiatives, digital platforms, and to show you [Content that may be useful to you](#), also on social media platforms or through [Programmatic Advertising](#) platforms (to the extent that you have authorized us to upload them to these platforms).

Customized Services and/or communications and/or [Content that may be useful to you](#) are based on your behaviour, interests, needs, preferences as well as your profile; such purposes may also be achieved using [Personal Data](#) collected through the use of cookies or other tracking technologies to analyse and predict customer's preferences providing customer with tailored offers.

This processing is based on your prior consent. When we contact you through social media platforms or through [Programmatic Advertising](#) platforms, we may act as [Joint Data Controller](#) with the relevant platform provider. Specific information and agreements will be in place with the platform provider before presenting any communication to you.

If you do not want personalized Services and/or communications or [Content that may be useful to you](#), you can change your preferences, as explained in the "[How to control your Data and manage your choices](#)" section below.

g) Analysing and improving our Services and creating new services and features

We use your Data and [Aggregated Information](#) to measure the performance of our [Services](#), to improve them or to create new ones. This can be done, for example, through the analysis of your interactions with [Our Network](#), [Our Events](#), our newsletter and/or marketing communications (if requested).

As far as possible, we use anonymous or pseudonymous data for these purposes. Only in exceptional cases would [Personal Data](#) be used. In such cases, the following applies: except for your consent to the customization of our [Services](#), measuring the effectiveness of our

[Services](#) and the creation of new [Services](#) is based on our legitimate interest in creating and maintaining [Services](#) that are truly useful to our users.

h) [Sharing Data with Partners for their own marketing purposes](#)

LPMI shares your contact details with selected third-party [Partners](#) for their own marketing purposes. [Partners](#) will contact you only by electronic means (e.g., e-mail, SMS, recorder phone call) and must provide their privacy notice to you. This processing is performed based on your prior consent. You can see the full list or categories of [Partners](#) with whom we shared your Data directly at: privacy-rights-lpmi@leapmotor-international.com.



i) [Complying with legal and tax obligations](#)

We may use your Data to comply with legal and tax obligations that we are subject to. Some legislation may require us, for example, to share your Data with public authorities (e.g., recall notices). Where this is required by law, this processing is necessary to comply with law. If this sharing is not required by law in your country, we will send them regardless, as explained in more detail in the "Protecting our interests and your interests" section below.



j) [Sending corporate and institutional communications](#)

To the extent permitted under applicable data protection law, we use your contact details to send corporate surveys and institutional communications regarding LPMI and/or its subsidiaries/affiliates. These are not marketing communications and are sent because it is necessary in our legitimate interest to provide consistent information to you.



k) [Protecting our interests and your interests](#)

To the extent permitted under applicable data protection law, we may need to use your Data to detect, react to, and prevent fraudulent and illegal behaviour or activities which could compromise your or our security or that of third parties. This purpose includes performing audits and assessments of our business operations, implementing security and financial controls, records and information management programs, and otherwise relating to the administration of our general business, accounting, record keeping and legal functions.

We will also use your Data to send you communications about the safety of your [Vehicle](#)/fleet (e.g., recall campaigns, software updates, etc.), even if there is no established legal requirement to this effect in the country you are in. These are not marketing, but service communications to ensure your safety when using your [Vehicle](#).

This purpose is necessary in the legitimate interests of safeguarding our business and protecting our customers, including you.



5. How we use your Data (method of processing)

Data collected for the purposes indicated above are processed both manually and via automated processing, namely, through programs or algorithms that analyse Data inferred by your activities, Information about your location, and Data collected by the Browser, Device and the Application.

Your Data may also be subject to [Combination and/or Crossing](#), to the extent permitted under applicable data protection law. This allows us to understand, for example, if a single user is utilizing our [Services](#) with the same [IP Address](#) or [Unique Identifiers](#) from the [Browser](#) and the [Device](#); or if promotional communications or [Content that may be useful to you](#) by reference to Information about your location or Data provided through your activities or Data collected by your Browser, Device, and the Application. The [Combination and/or Crossing](#) of your information for the purposes we process it for (e.g., customizing the [Services](#)) can be enabled or disabled as explained in the "How to control your Data and manage your choices" section below.



6. How we may disclose your Data

We may disclose your Data to the following recipients and/or categories of recipients ("Recipients"):

- **Persons authorized by us** to perform any of the data-related activities described in this document: our employees and collaborators who have undertaken an obligation of confidentiality and abide by specific rules concerning the processing of your Data;
- **Our Data Processors**: external organisations to whom we delegate some processing activities. For example, security systems providers, accounting and other consultants, data hosting providers, bank, insurance, etc. We have signed agreements with each of our [Data Processors](#) to ensure that your Data is processed with appropriate safeguards and only under our instructions;
- **System administrators**: our employees or those of [Data Processors](#) to whom we have delegated the management of our IT systems and are therefore able to access, modify, suspend or limit the processing of your Data. These subjects have been selected, adequately trained and their activities tracked by systems they cannot modify, as provided for by the provisions of our competent Supervisory Authority;
- **Our Network and Car Manufacturer**: [Our Network](#) in case you requested a service carried out by them (e.g. a request for a test drive close to you) or if you required their assistance or the one provided by the Car Manufacturer;
- **Our selected Partners**: when you consented to the communication to them of your [Personal Data](#) for their own marketing and/or profiling purposes and who act as autonomous [Data Controllers](#);
- **Law enforcement or any other authority whose provisions are binding for us**: this is the case when we have to comply with a judicial order or law or defend ourselves in legal proceedings.



7. Where your Data is located

We are a global company and our services are available in multiple jurisdictions worldwide. This means that your Data may be stored, accessed, used, processed, and disclosed outside your jurisdiction, including within the European Union, the United Kingdom, the United States of America, China or any other country where our [Data Processors](#) and sub-processors are located, or where their servers or cloud computing infrastructures may be hosted. We take steps to ensure that the processing of your Data by our Recipients is compliant with the applicable data protection laws, including EU and UK laws to which we are subject. Where required by EU or UK data protection law, transfers of your Data to Recipients outside of the EU/UK will be subject to adequate safeguards (such as the relevant EU/UK standard contractual clauses for data transfers between EU/UK and non-EU/UK countries), and/or other legal basis according to the EU and UK legislation. For more information about the safeguards implemented by us to protect Data transferred to third countries outside the EU/UK, please write to us at: dpo-lpmi@leapmotor-international.com.



8. How long we retain your Data

Data processed for the purposes indicated above will be retained for the minimum period necessary to fulfil such purposes.

However, the Data might be stored for a longer period in case of potential and/or actual claims and resulting liabilities and/or in case of other mandatory legal retention requirement and/or storage obligations.

- Customer Data processed for Marketing and Profiling purposes, will be retained by the controllers from the moment the customer gives consent until the moment the customer withdraws the consent. Once consent is withdrawn, Data will no longer be processed for Marketing and Profiling purposes, although it might still be kept by the controllers to manage potential claims and/or lawsuits. Data retention in case of Marketing and Profiling is compliant with the local law and with any decisions of the Data Protection Authority.
- Customer Data processing to comply with legal obligations will be retained for the period foreseen by the laws and regulations.

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- Customer Data processing to improve the product and the services could be retained for the minimum period necessary to fulfil such purposes and not beyond three years.

Once the relevant retention period/criterion has expired, your Data is erased pursuant to our retention policy. You can ask us for more information on our data retention criteria and policy by writing us here: dpo-lpmi@leapmotor-international.com.



9. How to control your Data and manage your choices

At any time, you can ask to:

- **Access your Data (right of access):** depending on your interactions with us, we will provide the Data we have related to you, such as your name, age, e-mail address and preferences.
- **Exercise your right to portability of your Personal Data (right to data portability):** where applicable, we will provide you with an interoperable file containing the Data we have about you.
- **Correct your Data (right to rectification):** for example, you can ask us to modify your e-mail address or telephone number if they are incorrect;
- **Limit the processing of your Data (right to restriction of processing):** for example, when you think that the processing of your Data is unlawful or that processing based on our legitimate interest is not appropriate;
- **Delete your Data (right to erasure):** for example, if you do not want us to keep your data and there is no other reason for keeping it;
- **Object to the processing activities (right to object)** and where we don't have a compelling reason to continue processing it;
- **Withdraw your consents (right to withdrawal)** for example, if you no longer wish to receive marketing communications from us.



You can exercise any of the above rights or express any concern or make a complaint regarding our use of your Data directly at: privacy-rights-lpmi@leapmotor-international.com;

At any time, you may also:

- contact our Data Protection Officer (DPO), here dpo-lpmi@leapmotor-international.com;
- contact the Supervisory Authority, here you can find the list of all the Supervisory Authorities by country https://edpb.europa.eu/about-edpb/board/members_en

10. How we protect your Data

We take reasonable precautions from a physical, technological and organizational point of view to prevent the loss, misuse, or modification of Data under our control. For example:

- We ensure that your Data is only accessed and used by, transferred or disclosed to Recipients that need to have access to such Data.
- We also limit the amount of Data accessible, transferred or disclosed to Recipients to only what is necessary to fulfil the purposes or specific tasks performed by the Recipient.
- The computers and servers where your Data is stored are kept in a secure environment, are password-controlled with limited access, and have industry standard firewalls and anti-virus software installed.
- Paper copies of any documents containing your Data (if any) are kept in a secure environment as well.
- We destroy paper copies of documents containing your Data that is no longer needed.
- When destroying Data recorded and stored in the form of electronic files that is no longer needed, we make sure that a technical method (for example, low level format) ensures that the records cannot be reproduced.
- Laptops, USB keys, mobile phones and other electronic wireless devices used by our employees who have access to your Data are protected. We encourage employees not to store your Data on such devices unless it is reasonably necessary for them to do so to perform a specific task as outlined in this Privacy Policy.
- We train our employees to comply with this Privacy Policy and conduct monitoring activities to ensure ongoing compliance and to determine the effectiveness of our privacy management practices.
- Any **Data Processor** that we use is contractually required to maintain and protect your Data using measures that are substantially similar to those set out in this Privacy Policy or required under applicable data protection law.

In case required by the applicable legislation, if a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Data transmitted, stored or otherwise processed, will be notified to you and to the competent data protection authority as required (for example, unless Data is unintelligible to any person or the breach is unlikely to result in a risk to your rights and freedoms and those of others).

11. What this Privacy Policy does not cover

This Privacy Policy explains and covers processing that we carry out as **Data Controller**.

This Privacy Policy does not cover processing carried out by subjects other than us, including and in particular:

- processing carried out by **Our Network**;
- processing carried out by social media or programmatic advertising platforms as **Joint Data Controllers** with us;
- processing carried out by regulatory authorities, law enforcement or other judicial or government entities;
- processing carried out by third parties who we share your **Personal Data** with as independent **Data Controllers**.

Regarding these cases, we are not responsible for any processing of your Data that is not covered by this Privacy Policy.

12. Usage of data for other purposes

If we should need to process your Data differently or for purposes other than those indicated herein, you will receive specific notice before such processing begins.

13. Changes to the Privacy Policy

We reserve the right to adapt and/or change this Privacy Policy at any time. We will inform you of any substantial adaptations/changes. QR codes and permanent links are printed in the booklet of your Vehicle to allow you reading at any time the latest versions of this Privacy Policy.

14. License

The icons illustrated in this Policy are "[Data Protection Icons](#)" by Maastricht University European Centre on Privacy and Cybersecurity (ECPC) [CC BY 4.0](#).

15. Definitions

Aggregated Information: refers to statistical information that does not contain your Personal Data. We use this information for analyzing and improving our services and creating new services and features and to create statistical reports for our Partners and Our Network.

Application: means the mobile application of LPMI.

Browser: refers to programs used to access the internet (e.g. Safari, Chrome, Firefox, etc.).

Car Manufacturer: refers to the following entity: Zhejiang Leapmotor Technology Co., Ltd., located in 1/F, No. 451 Wulianwang Street, Binjiang District, Hangzhou, Zhejiang Province, China.

Combination and/or Crossing: this is the set of fully automated and non-automated operations which we combine with the Data inferred by your activity, the Data provided by you used to provide the Services, analysing and improving our Services and creating new services and features, as well as to offer

Content that may be useful to you. We may also combine and/or cross information from different sources, such as information collected from Our Partners' Websites and Apps and/or Data collected from public or publicly accessible sources.

Connected Services: refers to the set of services described in the General Conditions of the Car Manufacturer, as well as the standard and optional services, if activated.

Content that may be useful to you: for example, if you search a certain type of Vehicle, we may display other content related to this model on Our Websites and Application or through Programmatic Advertising. Customization of the content may occur through the Combination and/or Crossing of Data.

Cookie: refers to a small text sent to your Browser from our sites or our Partners or Our Network. It allows the site to store information such as the fact that you visited the site, your language and other information. Cookies are used for different purposes, for example, to record your preferences regarding the use of Cookies (technical cookies), analysing and improving our Services and creating new services and features or Customizing our Services, including Content that may be useful to you. Information transmitted by Cookies is subject to Combination and/or Crossing with one of the Other Tracking Technologies where applicable.

Data Controller: refers to the legal person, public authority, service or other entity which, individually determines the purposes and means for processing your Personal Data.

Data Processor: refers to an entity that we engage to process your Personal Data solely on behalf of and pursuant to the written instructions of the Data Controller.

Device: refers to the electronic device (e.g. iPhone) through which you visit Our Website and Application and/or our Partners' Websites and Apps.

Indirect Collection: when the Partner which assures us to have received your consent or to have another legal basis that legitimizes the communication/sharing of your Personal Data with us. On this point, we precise that, before being used, we check how Partners collect and transfer data to us in order to respect your preferences.

IP Address: is a unique number used by your Browser, your Device and the Application in order to connect to the internet. The internet service provider provides this number allowing identification of the provider and/or the approximate area where you are located. Without this data, you cannot connect to the internet and use our Services or use Content that may be useful to you.

Joint Data Controller: refers to one or more legal persons, public authorities, service or other entities which, jointly determine the purposes and means for processing your Personal Data.

Other Tracking Technologies: pixel tags (tracers used with Cookies and embedded in images on web pages or the Application to track certain activities, such as the viewing of Content that may be useful to you, or to see if an e-mail has been read) or Unique Identifiers embedded in links to commercial communications that send us information when clicked on.

Our Events: these are events/showrooms organized by LPMI or in collaboration with other brands with which LPMI has signed partnership agreements.

Our Network: these are importers and/or retailers and/or dealers and/or repairers with whom LPMI, or its subsidiaries has/have signed commercial agreements for the sale of the Vehicles and/or for providing services/products assistance.

Our Partner's Websites and Apps: means the websites and mobile applications of our Partners or managed by our Partners with which we have commercial agreements (e.g. indirect collection) or all sites and mobile applications containing a LPMI Privacy Policy.

Our Websites: includes our social network pages, and some sections of Our Network's websites where this Privacy Policy is available.

Partners: means third-party entities who may communicate your Personal Data to us only after they have contractually assured us that they have obtained your consent or that they have another legal basis that legitimizes their communication/sharing of such data with us (for example, if you ask one of our Partners to book a test drive, when you purchase, and when you request to receive commercial communications). This definition also includes the selected Partners with whom we may share your Data. Partners may belong to the following product sectors: manufacturing, wholesale and retail trade, financial, bank, transportation and warehousing, information and communication services, professional, scientific and technical activities, travel agencies, business support services, artistic, sports, entertainment and amusement activities, activities of membership organizations, services of physical wellness centers, suppliers of electricity and gas, rental, e-mobility and insurance companies.

Personal Data: means any information relating to an identified or identifiable natural person whether directly or indirectly, as well as any information that is linked or reasonably linkable to a particular individual or household. For your convenience, we will collectively indicate all Personal Data mentioned also as **"Data"**.

Programmatic Advertising: these are platforms that can share the information they collect about you, such as your IP Address, with people who have an interest in showing you other Content that may be useful to you. In our case, if you visualize one particular model on Our Websites and Application, we will ask participants in Programmatic Advertising to grant us an advertising space on one of the websites you visit to display Content that may be useful to you.

Sensitive Data: means Personal Data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of genetic data, biometric data aimed at uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Services: collectively, this means the Connected Services (if applicable) and all the services available on Our Websites and Application, such as "configure", "find dealers", test drive bookings, the institutional newsletter, customer service, and Our Events.

Unique Identifiers: means information that uniquely identifies you or through which you may be identified. On a Vehicle, the Unique Identifiers are the license plate number and Vehicle Identification Number (VIN).

Vehicle: refers to a vehicle of a Leapmotor brand distributed by LPMI, or its subsidiaries.

Vehicle Data: means any technical, diagnostic and real-world data that is possible to collect via the Vehicle Device installed on the Vehicle (e.g., location, speed and distances, engine running time and turning off time; if the battery cable is cut, battery diagnostics, movements with the key out, presumed collision, as well as diagnostic data such as, but not limited to oil, and fuel levels, tire pressure and/or energy consumption engine status).

Vehicle Device: means singularly or collectively a device capable to collect Vehicle Data and the telematic Device (and associated sim card) installed on the Vehicle and better described in the General Conditions of the Car Manufacturer.
