

## Privacy statement for DCS-T certificates

Daimler Truck AG, Daimler Truck Campus, Fasanenweg 10, 70771 Leinfelden-Echterdingen, informs you in this privacy policy about the processing of personal data carried out by us.

Data protection officer is Daimler Truck AG.  
Contact person for the data protection related topics is below email address.  
Company data protection officer address of Daimler Truck AG is listed below.

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For the CEEAce architecture as well as future models/vehicle architectures, new safety concepts are being introduced. All companies and individuals working with control units or vehicles of this type will now require an approved authorization, represented in the form of a digital certificate (DCS-T certificate). A DCS-T certificate is issued either to a natural person (DCS-T certificate holder) or to a user with an assignment of a person designated as responsible and accountable for ensuring proper handling by the user (DCS-T certificate responsible). In order to obtain such a DCS-T certificate, an applicant authorized by Daimler Truck's contracting partner (the user) must go through an application and approval process on behalf of a rights recipient. In this process, the desired rights and personal data about the applicant, as well as the desired DCS-T certificate holder or DCS-T certificate responsible, are provided in an internet application. This includes the scope of rights, the control units to be accessed, as well as vehicle data (vehicle identification number) and the validity period of the DCS-T certificate. After approval by a responsible person, the granted rights, along with this data, are stored in the PKI/RA (Public key infrastructure/Registration authority), and the DCS-T certificate holder or DCS-T certificate responsible can obtain these DCS-T certificates using a tool (ZenZefiT). The usage of the certificates is stored.

The application and approval data are stored in Daimler Truck`s PKI/RA and are available for processing (approval, decline, rights verification) as well as for research and traceability purposes. Usage data is processed to ensure proper operation and to prevent abuse.

Below, we have compiled the most important information regarding data processing in the context of the DCS-T Certificate issuance and usage process for you. Whenever the term "data" is used in the text, it exclusively refers to personal data within the meaning of the General Data Protection Regulation (GDPR).

### **Notices:**

Daimler Truck is not responsible for data processing in the responsibility area or in the sphere of the user. The responsibility for the collection and transmission of data to Daimler Truck for the purposes of the user and for applying for and issuing DCS-T certificates and their use is by the user itself. To that extent, the user is also responsible for data protection of the DCS-T certificate holders and DCS-T certificate responsible.

As far as the applicant and the DCS-T certificate holder to be applied for or the person responsible for the DCS-T certificate are different, the applicant is responsible for passing on this data protection information to the respective person before applying for the DCS-T certificate.

## 1. **Affected people**

DCS-T certificates holder, DCS-T certificates responsible and applicants

## 2. **Data types**

### 2.1 Identification data

- Surname and Name of the applicant on the DCS-T certificate together with the ID (UserID Dealer Directory/GEMS or another Daimler Truck-internal ID) including company if applicable
- Surname and Name of DCS-T certificate applicant or DCS-T certificate responsible together with the available ID including company if applicable

### 2.2 Contact data of applicant, DCS-T certificate holder or DCS-T certificate responsible

- E-Mail address (business)
- Telephone number (mobile and business)

### 2.3 Vehicle data (FIN/VIN)

### 2.4 Certificate usage data

- DCS-T certificate-ID
- Date and time
- Information about the use of certificate (including whether access was denied)

## 3. **Purpose of processing**

The purpose of the processing is to review applications for and issuance of authorizations in the form of a digital DCS-T certificate. The purpose of assigning authorizations is to execute the respective existing contract or order with the user as well as to fulfill legal obligations. The purpose of storing the certificate usage is to ensure proper operation and prevent misuse.

## 4. **Legal basis for processing**

The legal basis for the processing is Article 6(1)(b) of the General Data Protection Regulation (GDPR) (fulfillment of contract), Article 6(1)(f) of the GDPR (legitimate interests: fulfillment of security requirements in the execution of orders as well as defense against external claims and enforcement of own legal claims), and always Article 6(1)(c) of the GDPR (legal obligations, especially tax and commercial law regulations).

## 5. **Data transfer / Sharing of data**

Daimler Truck may transfer data processed as part of the application process to other service providers, business partners, as well as authorities and public offices, if necessary for the execution of the contract or order. Authorities and public offices may also be recipients within the scope of their tasks, as far as we are obligated or authorized to transmit data. In individual cases, data may also be transmitted to lawyers and courts. Additionally, we may engage service providers for the provision, maintenance, and upkeep of IT systems through data processing agreements.

## 6. **Storage time**

We generally delete your personal data as soon as the purpose for which we collected and processed the data no longer applies. Beyond this point in time, storage and further processing only occur if necessary for the purposes of defending against external claims and enforcing our own potential legal claims, or in accordance with the laws, regulations, or other legal provisions applicable to us in the European Union or in third countries with an adequate level of data protection.

The identification and contact details of the applicant and the DCS-T certificate holder or responsible party will be deleted after the authorization expires and after commissioning of services for which DCS-T certificates were requested, along with a reasonable period for any subsequent claims. This is done independently of the deletion of data related to the application and approval processes, which occurs within a reasonable period after the completion of the respective application and approval process

## **7. Necessity of data processing / Consequences of providing failure**

The processing of the data is necessary to fulfill the contract or order and to manage the DCS-T certificates. If the data is not provided, a DCS-T certificate cannot be issued.

## **8. Rights of the effected person**

- 8.1 You have the right to request information about all personal data that we process about you at any time.
- 8.2 If your personal data is incorrect or incomplete, you have the right to have it corrected and supplemented.
- 8.3 You can request the deletion of your personal data at any time, unless we are legally obligated or authorized to further process your data (see also Section 6). If you request the deletion of your personal data, further active use of a DCS-T certificate will no longer be possible.
- 8.4 If the legal requirements are met, you have the right to request a restriction of the processing of your personal data.
- 8.5 You also have the right to lodge a complaint with a data protection supervisory authority at any time if you believe that data processing has been carried out in violation of applicable law.
- 8.6 Additionally, you have the right to object to data processing based on Article 6(1)(f) of the EU General Data Protection Regulation (EU-GDPR) at any time, free of charge and with effect for the future. To exercise your right to object, please send us an email. E-Mail to: [dataprivacy@daimlertruck.com](mailto:dataprivacy@daimlertruck.com).