

We value your privacy. No really, we do.

We know everyone says it, but at Lynk & Co, protecting your privacy is one of our top concerns. With openness being one of our core values, we want to give you as clear and transparent information as possible about how we use your personal data, so you can feel confident when using our services.

With this in mind, this policy will describe our guiding principles for using personal data, when, how, and why personal data is used, and what rights you, the data subject, have relating to your data. This policy applies to all our uses of personal data, e.g. collection, use, sharing, storing, etc. (any so-called processing of personal data).

At the end of this policy, we give you Information Notices about specific situations. These notices give more detailed information about how personal data will be used in connection with your various interactions with us.

Who is responsible?

Lynk & Co is responsible for making sure that your personal data is kept secure and only used in the right way (we're the data controller). Depending on what type of interaction you have with us, the specific responsible Lynk & Co unit will differ since we have separate companies in each of the countries where we offer our services. These local companies are typically responsible for the personal data used in marketing, sales and customer relations operations (things that have a connection to your local market), whereas Lynk & CO International AB (a Swedish registered company with corporate number 559151-8161), will be responsible for all other activities (e.g. relating to product and service development, vehicle quality and safety monitoring and provision of global services). In the specific Information Notices, the responsible unit will always be indicated.

In cases where we make available services or products that are not developed or managed by Lynk & Co (i.e. third-party services), the third parties themselves are responsible for their use of your personal data. Lynk & Co takes no responsibility for these third-party services. Instead, we recommend you take part of the respective third-party terms of service and privacy policy that apply for each such third-party service.

Our approach to using your personal data

Whenever we use your personal data, we follow a set of privacy principles. These principles guide our approach to using personal data in our daily work and helps us in our goal to develop privacy friendly products and services.

Lawfulness

We do not own your personal data. We only "borrow" it when it is needed and when it is legally allowed to do so. In most cases, we need to use your personal data to be able to deliver the services that you have signed up for. Other times, we may be required to use your personal data because we are obligated to do so by law. For some activities, the use of personal data may be necessary for one or more legitimate interests of Lynk & Co. In these cases, we will evaluate the impact of such activities on your rights and freedoms and only proceed with the activities if our assessment shows that your interest is not outweighing ours. For certain specific use-cases, we will base our use on your consent. If you have given your consent to any such activity, you always retain the right to revoke that at any time. If so, we'll stop using your data.

Data minimization

With great amounts of data, comes great responsibility. That's why we strive, both for your and our sake, to limit our use of personal data as much as possible, whilst still being able to offer our services. We do this by not collecting more data than what is actually needed, by being clear about the purposes of using your data, and by limiting the duration of the data storage as much as possible. We also strive to integrate privacy consideration directly into our products and services, e.g. by designing them so that any added data processing is only activated on your own initiative, as well as generally limiting our exposure to your personal data by implementing pseudonymization and, where possible, anonymizing the data completely.

Transparency

We want to be as clear as possible about when, why and how we use your personal data. We will strive to provide information about our use of your personal data wherever possible and reasonably practical or otherwise required by law. This information may be provided in layers with high-level information initially showed in direct connection with whatever activity or action you plan to take that will initiate some form of processing of your personal data, e.g. making an online purchase or submitting a request on our website. We then give you more in-depth information by referencing this policy and the additional details in the specific Information Notices.

Security and integrity

Personal data can be sensitive, so we have implemented and is continually improving technical and organizational measures designed to ensure that your personal data is only shared with the right people, that it is kept correct, and that it is protected against unauthorized or unlawful disclosure. These measures include e.g. only using sufficiently secure tools for storage and transfer of personal data, encrypting data when needed, and having administrative procedures regulating the collection, use, and distribution of personal data within our organization.

How your personal data is shared

We work with third parties who help us deliver many of our services. To enable this, we may be required to also share personal data with these parties. In these situations, we only share what is necessary to enable the provision of the services.

These third parties may include other Lynk & Co units, external suppliers, financial partners, workshops, and other companies within the larger GEELY group. We may also be required by law to share data to authorities as part of a government inquiry, dispute or other legal process or request.

When we partner with third parties where data sharing is needed, we make sure that they are contractually required to commit to the same kind of privacy requirements that apply to us, and when we contract a supplier to help us deliver a service on our behalf, we employ similar contractual obligations ensuring that these suppliers only use the personal data we give them for the purpose of their assigned task and only use it in accordance with the instructions we give them. This ensures that whenever we outsource data processing, Lynk & CO retains control over the personal data.

Transfer of personal data to third countries

Where our business partners, suppliers or group affiliates are operating from a country outside the European Union (EU) or the European Economic Area (EEA), (a third country), we may be required to transfer personal data to such a third country. Whenever we transfer your Personal Data to a third country having a lower level of protection of personal data compared to the EU/EEA, we use the standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your personal data. These clauses obligate the third country recipients of the personal data to treat it in compliance with EU standards of data protection.

How long we keep your personal data

We don't want to have personal data just lying around, so we only keep your personal data for as long as it's needed. That need is typically linked to our obligation to deliver our services to you. For example, if you have signed up for any of our offers the personal data necessary for that service will be retained for the duration of your customer relationship with us. So, depending on the type of service, the period of retention (and what personal data it includes) will differ. In some cases, we need to keep personal data independent of such a customer relationship, e.g. to meet certain legal obligations or to be able to defend ourselves in legal disputes. But in any case, we'll never keep your data longer than what is permitted by law.

Your data rights

Because it's your personal data, the law gives you certain data rights allowing you to have insight and exercise control over our use of your personal data. The applicability and extent of these rights vary depending on the specific processing situation, but always gives you the right to information about how your personal data is being used. If you want to exercise any of these rights, contact us using the contact information at the end of this policy. Read below for descriptions of the rights you have.

Right to information and access

Right to erasure ("the right to be forgotten")

Right to object

Right to rectification

Right to restriction

Right to lodge a complaint to a supervisory authority

Right to data portability

Right to withdraw your consent

Contact us

If you have any questions about our your personal data, or if you want to exercise any of your rights, please contact us at hello@lynkco.com.

The postal address to Lynk & Co International AB is Planetgatan 6, 417 55 Gothenburg, Sweden.

Lynk & Co has appointed a Data Protection Officer who can be contacted at dpo@lynkco.com.

Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. We will provide you with a new Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about how we use your personal data.