

### **Privacy Policy of Hedin Distribution AG for the brand Xpeng**

This privacy policy (DSE) is published on the website of Hedin Distribution AG (HDAG) and regularly updated. The target audience is end customers of HDAG interested in vehicles of the Xpeng brand(s).

This DSE should be placed on the website and linked from various pages and forms (newsletter, Instagram, etc.) where an up-to-date version is to be provided to customers and interested parties. It is also referenced in contracts with trading partners and third parties, as well as at events where personal data is collected through photos, videos, or for marketing purposes.

Authorized dealers must not embed this privacy policy on their websites without the necessary adjustments that arise from their function as a dealer. They should indicate, with reference to the processing of their customers' data by the supplier of the Xpeng brand(s), this practice and link to this policy alongside their own privacy policy. Authorized dealers are encouraged to create their own privacy policy adapted to their own data processing procedures.

**July 1, 2025**

HEDIN DISTRIBUTION AG  
Industriestrasse 6  
8157 Dielsdorf

# HEDIN DISTRIBUTION

## **Privacy Policy of Hedin Distribution AG**

Compliance with data protection is an important requirement for Hedin Distribution AG and the entire Hedin Mobility Group. We believe that protecting personal data is essential for building a trusting relationship with our customers. Therefore, our goal is to ensure maximum transparency in the processing of personal data provided by our customers, prospects, sales partners, and suppliers.

At Hedin Distribution AG, the protection of personal data and your privacy is very important to us. We take all necessary steps to ensure that personal data is processed securely and in accordance with legal requirements.

Below we inform you about how we handle personal data, in particular for what purposes we process personal data (e.g., via this website, vehicle purchase and service, online services, or Car-Connect services), to whom we transmit it, and the data protection rights and claims you are entitled to. When we speak of data below, we mean your personal data—any information by which you can be directly or indirectly identified.

## **Who is responsible for data processing**

HEDIN DISTRIBUTION AG

Industriestrasse 6

8157 Dielsdorf

HEDIN DISTRIBUTION AG is part of the Hedin Mobility Group, an internationally active group that includes various brands and business units in the automotive sector. The group comprises, among others, several legally independent companies in Sweden as well as abroad, especially in the sales of vehicles and vehicle parts, customer services (including connected services, maintenance, warranty), as well as financing and mobility services.

The Hedin Mobility Group and HEDIN DISTRIBUTION AG maintain a network of authorized dealers for the sale of their brands' vehicles and related products and services.

The group companies of Hedin Mobility Group and/or their dealer networks may collect and process personal data about you. Responsibility for the processing of personal data depends on which group company or dealer network you share your personal data with and what kind of customer relationship you have regarding the various offered services and products.

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## **Joint Responsibility**

In some cases, Hedin Distribution AG and the members of our dealer network (the authorized dealers) may also process your personal data as joint controllers.

In certain cases, the Hedin Mobility Group and Hedin Distribution AG may also process your personal data as joint controllers.

## **The contact details for the Data Protection Officer are:**

impunix AG  
Lagerhausstrasse 18, CH-8400 Winterthur  
privacy@impunix.ch  
www.impunix.ch

If you have any questions or concerns about data protection and exercising your rights, please contact this office.

## **What personal data do we process and for what purposes?**

“Personal data” means any information that can be used to directly (e.g., by your name) or indirectly (e.g., by an individual customer number) identify you.

We collect your personal data especially when:

- You visit one of our websites that may use cookies or other trackers.
- You contact us via an online form, email, phone, live chat, visit a dealer, or in any other way.
- You participate in a competition or event or subscribe to one of our newsletters.
- You purchase a vehicle or service from our sales partners (maintenance, repair, warranty, connected services).
- You use a connected vehicle or purchase or activate online services.
- You participate in one of our studies or customer satisfaction surveys.
- You create a user account to access our online services from your computer or smartphone.
- You interact with us on social media, including through Facebook, Instagram, and YouTube “Like” and “Share” buttons. This may result in the collection and sharing of personal data between the social networks and us.

We may also receive or obtain additional information about you from other companies in our group.

We generally commit to collecting only the personal data necessary for the specific purpose for which we process your personal data.

The personal data collected from or provided by you can be divided into the following categories:

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Category	Description
<b>Basic Contact Data</b>	Name, address, telephone number, email address
<b>Extended Contact Data</b>	Information provided by you such as date of birth, marital status, education, household size, career and situation, portrait photo, voluntary work, hobbies, job title, professional background, length of employment, tasks, activities, qualifications, assessments/reviews, certificates, etc.
<b>Professional Contact Data</b>	Name, first name, gender, address, email address, telephone number, mobile phone number, employer, function, department, responsibilities, etc.
<b>Contract Data</b>	Data regarding the business relationship, customer number, offers and purchased products, services (including online services), credit and financial services, contract date, purchase price, special requests, goodwill, warranties, etc.
<b>Interests and Preferences</b>	Information provided or collected about your interests, e.g., products of interest to you, preferred contract partner, hobbies, and other personal preferences.
<b>Online Account Data</b>	Account information, customer and prospect portals, payment information provided by you (e.g., credit card number)
<b>Identity Data</b>	Data to verify your identity, e.g., driver's license or vehicle registration certificate.
<b>Payment and Transaction Data</b>	Information about payment methods, purchases of products and services, discounts, etc.
<b>Service Requests and Inquiries</b>	Interactions with customer service by us or partners, as well as participation in market research studies.
<b>Credit and Banking Data</b>	Payment behavior, financial statements, data from credit agencies, scores, asset situation, bank details, credit card number, etc.
<b>Website and Chatbot Usage</b>	You provide us information about how you use the website, interests and contact details when you log into your customer account or exchange contact data via the optional chatbot. Otherwise, you remain anonymous to us. Data processing through tracking cookies is explained in the cookie notices.
<b>Usage of Apps and Services</b>	Information about the use of apps (on your mobile device) and services, etc.
<b>Comfort and Infotainment Data</b>	Address book in the infotainment system, vehicle technical data enriched with personal references, transmitted to the manufacturer only at your request.
<b>Vehicle Operating and Usage Data</b>	Mileage, trips, multimedia usage, VIN (vehicle identification number), battery charge status, driving mode, data collected in the vehicle, etc.
<b>Geo- and Location Data via Connect Apps</b>	Information about the vehicle's location, data from the vehicle or apps regarding location, Wi-Fi hotspot, etc.

The information required to respond to your inquiry, fulfill wishes and requests regarding a contract, or comply with a legal obligation is indicated on the collection forms. If you do not wish to provide the required information, we may not be able to process your request or provide the corresponding services. Other information is used to get to know you better, particularly to send you personalized offers. Therefore, this information is voluntary.

When we send you marketing information, our goal is to send you advertisements and offers that are most relevant to you, meet your needs, or are truly of interest to you. Using personal data (which you provide to us directly, which we receive from our partners, or which we collect automatically when you visit our websites or use our mobile applications), we create a profile of you that allows us to evaluate and predict your personal preferences and/or interests for our products and services as accurately as possible. Better knowledge about you helps us improve your satisfaction.

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## **Joint responsibility for data processing between Hedin Distribution AG and authorized dealers**

### **Vehicle test drive**

Test drive requests can be recorded via websites, apps, call centers, or events. The data provided is processed by Hedin Distribution AG and transmitted to an authorized dealer to carry out the test drive.

This is done either to the dealer preferred by the interested party or to the dealer with whom the requester has a customer or interest relationship. Assignment can also be made by postal code if no dealer contact has been registered so far.

### **Vehicle sales**

A customer buys a new vehicle from a vehicle dealer. The dealer enters the vehicle order into a tool provided by Hedin Distribution AG. For processing the vehicle order, this data is transmitted to Hedin Distribution AG and the Hedin Mobility Group.

### **Warranty extension and maintenance contracts**

Warranty extensions and maintenance contracts are concluded at the dealer between the customer and insurance service providers or the Hedin Group, which act as processors on behalf of Hedin Distribution AG. The data is collected and transmitted to Hedin Distribution AG and the Hedin Mobility Group. The data transmitted to Hedin Distribution AG is processed for contract fulfillment and invoicing.

The data is also transferred to internal workshop information systems. The stored data can be viewed by the garages as well as Hedin Distribution AG. They serve to utilize the warranty extension Europe-wide or maintenance contracts at every Swiss brand garage.

Information on which vehicles already have a warranty extension or maintenance contract is transmitted by contractual partners to Hedin Distribution AG and the Hedin Mobility Group. Hedin Distribution AG uses this information to avoid sending related offers to customers who already have such a contract.

### **Service inquiries**

Contact and service inquiries can also be recorded via the websites of Hedin Distribution AG. The data provided is processed by Hedin Distribution AG and either handled internally to respond to the inquiry or transmitted to the dealer named by the applicant.

### **Service appointment booking**

Service bookings can also be recorded via the websites of Hedin Distribution AG. The data provided is processed by Hedin Distribution AG and transmitted to the dealer named by the applicant to respond to the request.

### **Vehicle Repair**

A workshop order is created in the dealer system. This order for invoicing is also electronically transmitted to Hedin Distribution AG. The data is necessary to ensure complete documentation and tracking of all interventions on the vehicle. These workshop data are also made available to Hedin Distribution AG to conduct customer satisfaction surveys. In the course of technical inquiries from the authorized dealer to Hedin Distribution AG regarding vehicle repair, the vehicle identification number (VIN) is transmitted. This is necessary to determine the correct vehicle data.

### **Spare Parts Sales**

As part of the workshop order, the spare parts required for the repair are documented. Once the order is recorded and completed in the dealer system, all data is additionally electronically transmitted to Hedin Distribution AG. This data is necessary to ensure complete documentation and tracking of all interventions on the vehicle as well as to conduct customer satisfaction surveys.

### **Roadside Assistance**

Roadside assistance is not only performed by authorized dealers. Depending on the location of the breakdown, assistance may also be assigned to third parties. In principle, the customer contacts the roadside assistance service provider of Hedin Distribution AG. In case of a valid mobility guarantee, the available authorized dealer is contacted. The customer's phone number and the VIN of the respective vehicle are disclosed to the responsible dealer.

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## General Inquiries

Information requests are recorded via Hedin Distribution AG websites, the call center, or events. The inquiries are either answered directly by Hedin Distribution AG or, after consultation with the requester, forwarded to an authorized dealer for response.

## Complaints

The customer has the option to submit complaints directly to Hedin Distribution AG or to the authorized dealer via Hedin Distribution AG websites or the call center. To resolve these complaints satisfactorily, the relevant information is exchanged between the authorized dealer and Hedin Distribution AG.

## Customer Satisfaction Surveys

New vehicle customers as well as workshop customers may be surveyed about their satisfaction with the vehicle purchase or workshop visit. For this purpose, personal data is transmitted from Hedin Distribution AG to a service provider. The customer is invited by email or SMS to participate in the survey and can respond via an online questionnaire, either anonymously or personalized.

The results are provided to Hedin Distribution AG by the contractual partner. For persons who responded personalized, personal data is visible in the results. The survey serves to measure customer satisfaction. Hedin Distribution AG has a legitimate interest in improving the quality of customer service and establishing general action plans for national topics. Individual contractual partners also have a legitimate interest in improving customer service quality and defining targeted measures.

Furthermore, customers may express a wish to be contacted by Hedin Distribution AG or their contractual partner when answering the questionnaire. For this purpose, personal data is also transmitted to Hedin Distribution AG or the respective contractual partner.

It is noted that the respective contractual partner and Hedin Distribution AG are entitled to invite customers by postal mail, email, or SMS to participate in customer satisfaction surveys. Should the customer not wish to receive such invitations, this will be taken into account upon appropriate notification to [info@hedindistribution.ch](mailto:info@hedindistribution.ch).

## Vehicle Connect Apps

Connect Apps are online applications or customer platforms available exclusively to customers. In addition to providing convenient vehicle-related features, they offer numerous benefits such as exclusive offers, prize draws, and loyalty programs.

Customers can enter their personal data directly on the online platforms and specify their preferred communication channel. This information is used by both Hedin Distribution AG and the respective authorized dealer in order to provide optimal customer service.

The app serves as a mobile customer portal designed to make everyday life with the vehicle easier. It allows customers to:

- use vehicle service functions,
- schedule appointments with their authorized partner,
- view their service contracts,
- plan upcoming trips,
- contact roadside assistance directly via the app,
- benefit from exclusive advantages and personalized offers for their vehicle.

## Marketing Campaigns

Customers and interested individuals are informed about new vehicles and/or after-sales service offers as part of marketing campaigns. Customers may also receive reminders about important dates.

The processing of marketing campaigns is handled through the joint customer database or the database for interested individuals of Hedin Distribution AG and its contractual partners.

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## **Competitions / Prize Draws**

Customers and interested individuals may participate in competitions and prize draws to win prizes.

The handling of competitions and prize draws is managed via the joint customer database or the database for interested individuals of Hedin Distribution AG and its contractual partners.

## **Recall Campaigns**

Hedin Distribution AG receives a list of vehicle identification numbers (VINs) from authorities, manufacturers, or the Hedin Mobility Group. This list is either processed internally or forwarded to a processor (service provider). It is checked whether the vehicles are registered in Switzerland. Generally, three parties are involved in a recall campaign: Hedin Distribution AG, a possible service provider, and the Federal Roads Office (ASTRA). The owners of the affected vehicles are informed of the recall and are then advised to contact their authorized dealer. If only a few vehicles are affected, the owners will be contacted directly by Hedin Distribution AG. If the recall completion rate is too low, Hedin Distribution AG instructs the dealer to contact the owners directly.

## **Data Subject Rights**

Data subject rights are managed by Hedin Distribution AG. Regardless of whether the request is submitted to a dealer or directly to Hedin Distribution AG, it is processed by Hedin Distribution AG and its processors with the support of the contractual partners. Hedin Distribution AG may forward the request to the Hedin Mobility Group so that it can be processed in their central systems. The response is then sent to the requester by Hedin Distribution AG.

## **Workshop Mystery Shopping with Real Customers**

Hedin Distribution AG may conduct mystery shopping in its partners' workshops via a processor. To ensure a realistic testing scenario, real customers of the respective workshop are used for the visits. Hedin Distribution AG has a legitimate interest in reviewing processes and customer service, providing individual feedback to partners, and defining improvement measures where necessary.

Eligible customers (based on the upcoming service due date) are contacted by the processor on behalf of Hedin Distribution AG to ask if they are willing to participate as a mystery shopping tester.

## **Newsletter Distribution**

Newsletters can be subscribed to via the websites of Hedin Distribution AG. The data provided will be processed by Hedin Distribution AG.

## **How long do we store your personal data?**

We process your personal data for as long as necessary to fulfill our contractual and legal obligations or as required for the purposes for which the data was collected. Specifically, this means for the duration of the entire business relationship (from initiation and processing to termination of a contract, warranty periods, and any follow-up phases). In addition, statutory retention and documentation obligations apply. Data may be retained for the period during which claims could be asserted against us and as long as we are legally obliged to do so or have a legitimate business interest (e.g., for evidence or documentation purposes). Once your personal data is no longer required for the purposes mentioned above, it will generally be deleted or anonymized, wherever possible. For operational data (e.g., system logs), shorter retention periods may apply.

## **Who can access your personal data?**

Within the Hedin Mobility Group and its network members, we ensure that only those individuals who require access to your personal data as part of their role are duly authorized to do so.

We work with trusted third-party service providers to process your data—either in full or in part—acting as data processors on our behalf and in accordance with our instructions. This includes:

- hosting, operating, or maintaining our databases, websites, and mobile applications,
- providing authentication services,
- managing customer relationships (call centers, communication tools, etc.),
- delivering services related to our marketing activities, including sending out offers,
- organizing competitions and events,
- conducting studies and surveys.

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In all these cases, we ensure we only collaborate with reliable companies and formalize these relationships (contracts, audits, warranties, security testing, etc.).

We also offer the option to use your social media login credentials. Please note that this may involve sharing your profile information with us. The specific data shared depends on your settings on the social media platform. These platforms apply their own privacy policies.

Finally, we may need to disclose your personal data to third parties in order to fulfill legal obligations (e.g., collecting a fine after a test drive) or to comply with administrative or judicial decisions.

## **Legal bases for processing your personal data**

We process your personal data only when there is a valid legal basis for doing so. This may include the following scenarios:

- Contractual performance: processing necessary to perform a contract or pre-contractual steps.
- Legitimate interests: processing necessary to protect our or third parties' legitimate interests, provided that your fundamental rights and interests do not override them. This includes ensuring business operations, data security, protection against misuse, legal claims enforcement, and compliance with Swiss law.
- Legal obligation: processing required to meet a legal obligation.
- Public interest: processing necessary to perform a task carried out in the public interest.
- Consent: processing based on the explicit consent of the individual.
- Vital interests: processing necessary to protect the vital interests of the data subject or another individual.

## **How is your personal data protected?**

Your personal data is stored on secure servers. We have implemented appropriate data security and privacy protection measures that are in line with the latest technological standards, and we require the same from our processors and partners.

If the processing of personal data involves data transfers, we ensure that these transfers take place under appropriate conditions that guarantee a sufficient level of protection, security, and confidentiality.

When a digital account is created, entering a password that meets our security standards is mandatory and part of our privacy policy. It is your responsibility to keep this password confidential.

Whenever possible, your data is processed within Switzerland, Liechtenstein, and the European Economic Area (EEA). However, since some of our service providers or manufacturers' processors are located in countries outside the EEA, your personal data may be processed in those countries. In some of these countries, different data protection laws may apply compared to Switzerland or the European Union. In such cases, we (i) ensure that the transfer complies with applicable regulations, and (ii) take appropriate steps to guarantee adequate protection of your privacy and fundamental rights (particularly by using the European Commission's Standard Contractual Clauses).

## **Preferences and Automated Individual Decisions**

As a general rule, we do not use fully automated decision-making to establish or manage business relationships. Should such processes be used in individual cases, we will inform you separately where required by law and explain your associated rights.

## **What rights do you have?**

In accordance with data protection regulations, you have various rights:



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**Right to object:**

You may object to the processing of your personal data if you have reasons arising from your particular situation. In some cases, you may also request the restriction of processing, as provided by law.

**Right to object to direct marketing:**

You may at any time request to no longer receive communications from us relating to offers, news, or events. You can exercise this right in particular by using the unsubscribe link included in each marketing email.

**Right of access:**

You have the right to receive clear, transparent, and understandable information about how we use your personal data and what your rights are.

**Right to rectification:**

You have the right to request the correction of your data if, despite our efforts to keep it up to date, it is inaccurate or incomplete. This is essential for us to meet our obligation to maintain accurate records about you.

**Right to data portability:**

Under certain conditions, you have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and to transmit it to a third party, where technically feasible.

**Right to erasure:**

You have the right to request the removal or deletion of your data. However, this right may be limited due to our contractual or legal obligations (e.g., an ongoing contract or to prevent legal action).

To exercise any of these rights, you can contact us via email at [info@hedindistribution.ch](mailto:info@hedindistribution.ch).

We may request specific information or documents (such as ID or vehicle registration) to verify your identity.

Every data subject also has the right to take legal action or file a complaint with the competent data protection authority. In Switzerland, this is the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch>).

**Privacy Information on Our Websites and Apps**

When you visit one of our websites or use our mobile apps, we may automatically collect technical information about you, including your IP address, browser settings, and the use of trackers (cookies).

**Cloudflare or Similar Content Delivery Networks**

We use Cloudflare (Cloudflare, Inc., 101 Townsend St, 94107 San Francisco, USA, [privacyquestions@cloudflare.com](mailto:privacyquestions@cloudflare.com)). Cloudflare is a content delivery network (CDN) that distributes our website across multiple servers and provides security features. It also acts as a reverse proxy for our site or certain services. Cloudflare receives your personal data and acts as our processor. The website's functionality depends on this processing.

**Google Analytics**

Our website uses the Google Analytics web analytics service. The data controller is Google Ireland Ltd. Google Ireland may engage Google LLC in the USA as a subprocesser. Google Analytics uses persistent cookies to analyze your website usage. These cookies generate information about your use of our site (including a shortened IP address), which is usually transferred to and stored on Google's servers. We use Google Analytics with IP anonymization enabled, meaning your IP address is truncated before transmission to prevent direct identification. We consider the data collected as personal

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data, since Google could link it to other data (e.g. a Google account) to identify you. For more information, consult Google's privacy materials.

## **Google Fonts**

Our site uses Google Fonts to ensure consistent typography. When you access the site, your browser loads the necessary fonts from its cache. To protect your privacy, we host the fonts on our own server whenever possible so your IP address is not shared with third parties. However, certain services like Maps, Captcha, or Bootstrap may still load external fonts. If your browser does not support external fonts, your system default font is used. See Google Fonts' privacy information for details.

## **Google Tag Manager**

We use Google Tag Manager (or other tag managers) to manage website tags—such as Google Analytics and marketing tools—via an interface. The Tag Manager itself typically does not process user personal data, though usage data may be passed to Google. For details, refer to the provider's privacy documentation.

## **Google reCAPTCHA**

To protect our online forms, we use Google reCAPTCHA (Google LLC). It helps detect automated entries by analyzing your IP address, behavior on the site, and other technical data. Google truncates the IP address in Switzerland or the EEA; full IP addresses are only sent in rare cases to U.S. servers and then truncated. The legal basis is our overriding interest in security and misuse prevention (Art. 31, para. 1 DSG). See Google's privacy policy for full information.

## **jsDelivr**

Our website uses jsDelivr, a public CDN for open-source libraries run by Prospect One. When loading assets, your IP address may be transmitted to jsDelivr servers. According to the provider, no data is stored or shared for analytics. See jsDelivr's privacy policy for more details.

## **IP Location API**

To enhance user experience and perform security-related analysis, we use the geolocation service ipapi.co (apilayer GmbH, Vienna, Austria). It estimates users' approximate location (e.g., country, region, city) based on their IP address. This is done in real time. The processing includes capturing and sending IP addresses and geolocation metadata (time zone, ISP, country code) to ipapi.co servers. The legal basis is our legitimate interest in the stability, security, and user optimization of our web offerings (Art. 31, para. 1 DSG). See their privacy policy for details.

## **Usercentrics**

We use the Usercentrics consent management tool (Usercentrics GmbH, Munich, Germany) on our website to manage and document data processing consents as required by law. A banner lets users choose which technology or service categories to agree to or reject. Usercentrics stores user consent decisions, timestamps, and technical info (e.g., anonymized IP, browser info). This data is usually stored on their EU servers to prove consent. See Usercentrics' privacy policy for details.

## **Changes to Information**

We may update this privacy policy at any time; only the current version is valid. We recommend checking this privacy notice regularly.