

Telematics Data Protection Notice For Commercial Vehicles and Mobile Equipment

This data protection notice (“Notice”) is provided by Cummins to inform you about a telematics device installed on your commercial vehicle or mobile equipment (collectively, “mobile equipment”). The Notice describes the telematics and surrounding limited mobile equipment-related data collection, how the data is used, and how you may contact Cummins for additional information or any questions.

What is a Telematics Device?

The telematics device that is the subject of this Notice is a safety-related component of the mobile equipment. Similar to other safety-related technologies installed on commercial vehicles or mobile equipment (such as lane change assist), the telematics device is a “smart technology” application designed to achieve a safer and more optimal use of the vehicle. Specifically, the device sends technical information (in the form of encrypted digital codes and letters) pertaining to the functionality of the engine, powertrain, electric motor and/or battery (“key equipment components”) to Cummins. Cummins analyzes the data for purposes of determining whether those key equipment components are operating in an optimal way, and, for customers who sign up for Cummins digital products or services, sends alerts about the maintenance and repair needs, along with vehicle or equipment optimization information, pertaining to their mobile equipment. This helps customers ensure the proper running condition of the mobile equipment, optimize their use, and possibly avoid the potential for longer vehicle or equipment downtime and costs associated with overlooked maintenance and repair issues. In some situations, it also helps avoid potential road safety issues.

What Data is Collected Via the Telematics Device?

The telematics device transmits certain data parameters to Cummins in relation to the functioning of the key equipment components in the mobile equipment. The parameters are in the form of encrypted digital codes and letters and are aligned with internationally recognized standards for proper working conditions of mobile equipment. Through encrypted channels, those parameters are transmitted along with relevant vehicle identification factors (i.e., the vehicle identification number (VIN) and engine serial number (ESN)), which link the parameters to a particular mobile equipment.

The surrounding data collected by Cummins in connection with the telematics device is limited to that which is necessary and proportionate to the proper functioning of the key equipment components. The data includes GPS (geolocation) data, terrain, outside temperature, humidity level/weather conditions, road conditions, duration and period of use of the vehicle, speed, and acceleration/deceleration activity. GPS data is *only* used in connection with mobile equipment performance and safety considerations (and related product improvement), and not for any separate purpose. For avoidance of doubt, that data is never used for any type of tracking or profiling of drivers.

Cummins does not intentionally collect any data pertaining to drivers/end users in connection with its telematics services or attempt to identify those drivers. In very limited situations, the driver/end user also owns or leases the mobile equipment, and/or interacts with Cummins in relation to repair or warranty services or contacts the company with questions. Any data collected by Cummins is limited to that which is relevant for the interaction, and the data is not processed for unrelated purposes.¹

How is the Data Processed?

As noted above, the telematics and limited surrounding mobile equipment-related data collected by Cummins is used to evaluate the functionality and safety of the key equipment components, alert customers to maintenance and service needs, and provide information about vehicle or equipment optimization, and provide any other Cummins digital products or services that a customer may have subscribed for. The information is also used for purposes of allowing Cummins to improve its product development and research.

How is the Data Shared?

Cummins may share the telematics and surrounding limited data with its affiliated companies as well as other third parties that partner with Cummins to support and analyze the telematics activities and services. Those affiliates and other third parties are required to uphold a consistent level of protection for the shared data and may only use the data for the purposes described in this Notice.

In rare situations, Cummins may also be required to share some of the data with regulatory or legal oversight agencies. If so, it will only share the minimum data required to respond, and where feasible, Cummins will take reasonable steps to notify the customer in advance.

How is the Data Stored, Safeguarded, and Retained?

Cummins has adopted technical and organizational measures for the telematics and surrounding data that are designed to protect it from loss, misuse, alteration, destruction and unauthorized access. The safeguards are updated when new threats become known. Also, the telematics devices are designed such that the security upgrades can be implemented remotely, without the need for a service call.

Cummins retains the telematics and surrounding data in accordance with business and legal obligations, and then the data is securely and irreversibly destroyed.

How are the Cross-Border Data Transfer Rules Fulfilled?

If you live outside of the United States, we want you to be aware that the telematics and surrounding data collected by Cummins and its partners may be transferred outside of your home country, including to the U.S. where Cummins is headquartered, and to cloud storage centers operated by U.S.-based level A storage providers. The data protection laws and requirements vary by country and may not offer the same level of protection for the data as the laws in your country.

¹ Cummins relies on the customers/owners of the vehicle to share this Notice with the drivers/end users as the customers/owners deem warranted.

Nevertheless, Cummins has taken steps to ensure an adequate level of protection for telematics and surrounding data irrespective of where it is accessible or stored. Cummins also upholds cross-border data transfer requirements in a manner consistent with the laws and requirements in the countries where the telematics devices are used.

What Rights Do Customers Have in Relation to the Telematics Data Collection?

As noted above, the telematics devices are installed for safety-related purposes in relation to the key equipment components. Newer Cummins engines and electric solutions come equipped with these devices, and the devices may also be offered as an after-market option for older engines.

Customers can choose whether to receive alerts from Cummins about maintenance and repair needs for their mobile equipment which are identified through the review and analysis of telematics data. With a valid telematics service, they can sign up for Cummins digital products or services at <https://connectedsolutions.cummins.com>, and can also exercise other rights, or modify their contact preferences, or unsubscribe from those services by emailing us at ConnectedSol.Support@cummins.com. They can also go to <https://www.cummins.com/privacy-and-legal> to review our general data protection practices. Should customers have concerns that are not addressed to their satisfaction by Cummins, they may also contact relevant data protection oversight agencies in their country.

Is there any Automated Processing Taking Place Related to a Data Subject?

There is no automated data processing pertaining to the personal characteristics of the customer or drivers of the mobile equipment.

Where Can I Go For Additional Information or Questions?

You can contact Cummins at dataprivacy@cummins.com for data protection-related questions or use the Contact Us link on our website.

Cummins values your interest in our products and services.

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