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Vice President, Government Relations

Ford Motor Company  
1350 I Street, Suite 450  
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February 3, 2014

The Honorable Al Franken  
United States Senate  
309 Hart Building  
Washington, DC 20510

Dear Senator Franken,

Thank you for recognizing the importance of privacy in motor vehicles and for taking the time to reach out to Ford. Ford is absolutely committed to protecting our customers' privacy. No location data is wirelessly transmitted from the vehicle without customer consent. Location data is used only to support customer requests for services, and to troubleshoot and improve our products.

We appreciate the opportunity to engage with you and other policymakers on these important privacy issues, and to have the opportunity to clarify several statements in the Government Accountability Office (GAO) report. We have strong accountability at Ford for the handling of any personally identifiable information (PII) of our customers, and safeguard customer information with physical, technological, and administrative safeguards. Additionally, the GAO report stated no company allows customers to delete their location data. At Ford, that is not true. If customers contact our Relationship Center and request deletion of the location data they provide through one of our opt-in connected services, we will delete it.

Attached please find our responses to your questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt Magleby", with a horizontal line underneath.

Curt Magleby  
Vice President  
Government Affairs

Ford Motor Company

*(1) What location information does Ford collect from drivers of Ford vehicles?*

Ford offers an embedded navigation system on all 2013 and 2014 model year vehicles in the United States. The navigation system stores latitude, longitude, and a timestamp, on board the vehicle in a temporary buffer. The data is stored for approximately 2-3 weeks based on miles driven. Location data is never transmitted off board the vehicle by the navigation system to Ford or anyone else.

Ford also offers several connected services to customers. SYNC is a voice-activated system that controls music, navigation, climate, and other functions. While these functions require no connectivity, the customer can also pair SYNC with his or her mobile device through Bluetooth wireless connectivity to enable several connected services to enhance the customer's experience, which are SYNC Services, SYNC Applink, SYNC Vehicle Health Reports, and SYNC 911 Assist. Ford also offers two limited-volume connected services, MyFord Mobile (and MyLincoln Mobile) and Crew Chief. Each of these connected services requires customer consent before wirelessly transmitting any location data. The following is a detailed description of each connected service:

- **SYNC Services** is a system that provides travel services to the customer (e.g., business search, turn-by-turn directions, and traffic updates) upon request but only if the customer provides consent on a website through acceptance of a user agreement. SYNC Services may use the vehicle's GPS data or GPS data from the customer's mobile phone to provide requested services. Vehicle travel information is transmitted to Ford and service providers, and used only to fulfill the customer request, to troubleshoot, and to improve products. The data is kept for 60 days.
- **SYNC Applink** is a system that connects certain approved mobile phone applications to the vehicle through voice commands. Currently, this service includes certain navigation, destination search, and news applications. Customers must choose to install these applications and opt into the use of GPS information to provide the services requested. Any vehicle location data requested by these apps is wirelessly transmitted directly to the mobile app provider and not to Ford.
- **SYNC Vehicle Health Report** is a system that, with the consent of the customer, periodically uploads vehicle diagnostic information to Ford, in order to provide the customer with information online about vehicle condition. This does not include GPS or speed data, but is included here because it is a wireless connected service. To use this feature, the customer must consent in the vehicle through a

prompt and also agree to the user agreement on a website.

- **SYNC 911 Assist** is an emergency assist system that, with the customer's consent, can provide to emergency services – not Ford – the vehicle location in the event of certain types of crashes.
- **MyFord Mobile App (MyLincoln Mobile App)** is a feature for plug-in hybrid or electric vehicles only, approximately 1% of Ford's 2013 U.S. sales, which allows the customer, through a mobile phone application, to use the following features: Vehicle Locator, Charge Station Finder, Trip Planner, Saved Charge Locations, and Key Personalization. MyFord Mobile and MyLincoln Mobile must be activated and the customer must give consent before any data is transmitted. To provide these features, GPS information, travel direction, and vehicle speed may be transmitted. Vehicle speed is only transmitted under certain circumstances, such as when the electric battery charge is low. Ford and our service provider retain personally identifiable location data for 90 days.
- **Crew Chief** is a fleet management system that is only available for commercial sales. Crew Chief is on less than 2% of Ford's commercial sales for 2013 model year (about 1/5 of 1 percent of total sales). The customer must activate Crew Chief by agreeing to a service contract with the third-party provider, Telogis, before any data is transmitted. Ford does not receive personally identifiable data, which is transmitted by participating fleets to Telogis. Ford only receives anonymized data, which is used for internal quality improvements. Crew Chief transmits fleet management data, such as GPS location and speed of vehicles.

*(2) How exactly does Ford obtain a driver's consent for that collection?*

The discussions of the services highlighted above describe when consent is obtained for each wireless connected service. For each service, Ford receives consent from the customer through in-vehicle prompts, website user agreements, or mobile app user agreements. We use vehicle owner guides and, for optional opt-in connected services, the terms and conditions on company websites or in application user agreements to communicate directly to customers how data will be used.

*(3) Does Ford share any location data with anyone?*

Ford provides personally identifiable location data to our service providers only to fulfill requests by customers through the wireless connected services described above. These service providers are contractually bound to protect this information. Ford does not share such data with any other companies, and Ford does not sell this data.

*(4) What kind of location data does Ford share, and with whom does Ford share it?*

24/7, Inrix, and MyAssist, are the third party service providers Ford currently uses to provide SYNC Services, and which receive location data to fulfill customer requests. Acquity Group is the service provider that receives MyFord Mobile location data. Location data includes latitude and longitude, and may contain a timestamp from the vehicle. While not involving third-party companies, SYNC 911 Assist can provide location data to local 911 services to facilitate emergency assistance.

*(5) Does Ford share location data, in any form, with government agencies or law enforcement? If so, does Ford require a warrant before sharing that data?*

To the extent Ford may have already received location data through an opt-in connected service, we will not release such data to a third party unless we have the consent of the vehicle owner or pursuant to a court order.

Through the 911 Assist service, Ford can provide vehicle location data to emergency services to help locate the vehicle in the event of certain types of crashes. This information is provided over the phone and also includes a verbal statement that the vehicle has been in a crash.

In addition, from time to time, Ford receives court orders on behalf of law enforcement or individuals involved in litigation to retrieve and provide data from various vehicle modules. Such data is retrieved with direct physical access to the vehicle, and on rare occasions has included location information.

*(6) How exactly does Ford protect the privacy of the data that it does and does not share?*

Ford has numerous safeguards in place to protect personally identifiable information (PII), including physical, technological, and administrative safeguards. These include access controls that limit unnecessary or unauthorized access by employees without a need for PII information and strong accountability for the handling of PII, as well as data security measures such as hashing and data encrypting.

Ford also limits the GPS data that is transmitted to service providers to the minimum amount needed to fulfill the customer's request. In most cases, GPS data transmitted to service providers does not contain any information that is personally identifiable. In the case of SYNC Services, a service provider receives the customer's cell phone number in order to authenticate the user as an active subscriber before fulfilling the customer's request.

As indicated, the connected service providers are contractually bound to protect personally identifiable location data, and can use the information only for the purpose of fulfilling the customer request.

*(7) How long does Ford retain this data?*

For SYNC Services, Ford retains location data for 60 days. For MyFord Mobile, Ford retains location data for 90 days. For Crew Chief, Ford does not receive any personally identifiable location data from Telogis. For the other wireless connected services described, Ford does not receive any location data. Ford may retain anonymized location data longer to improve our products.

(8) *How long is this data retained by the third parties who have received this data from Ford?*  
Ford service providers have location data retention periods that are aligned with Ford's retention periods.