

Privacy Statement for Circle K Drive

1. Who are we? [🔗](#)

Circle K is part of Alimentation Couche-Tard group. Alimentation Couche-Tard is a Canadian based group and a world leader in the convenience store sector. In Europe, Couche-Tard is known through its Circle K trademark.

Circle K AS is a company registered in Norway with office at Schweigaards gate 16 Oslo, Norway, with company number 995532921, and its affiliates (collectively, “Circle K”, the “Company”, “we”, “us” or “our”) in the European Union / European Economic Area countries where this privacy statement is posted. The specific Circle K entity that acts as the controller of your personal data depends on your country of residence and is listed in the “Circle K Europe affiliate contact information” section below. For example, if you are using the application in Germany, the controller is Circle K Deutschland GmbH & Co. KG. If you are in Belgium, the controller is Circle K Belgium SA. Each listed Circle K entity operates as a separate data controller for users in its respective country.

This privacy statement will help you to understand how we process your personal data. This statement will tell you things like what information we use to provide you with services, what we do to keep your data safe, what partners we engage to process our data, and what are your privacy rights.

2. How and when does privacy statement apply? [🔗](#)

This privacy statement describes the personal data processing in Circle K Drive application (“the application” or “the app”). The privacy statement consists of general Circle K application privacy information, and service-specific privacy information.

This application

This privacy statement applies to all processes carried out via Circle K Drive application, which are described further in this statement.

3. Purposes of the processing [🔗](#)

We will process personal data to provide you with services available in the application, and to ensure application functionality. The different purposes of data processing are described below.

To ensure application functionality and measure performance

We will process some personal data in order to ensure the app safety and functionality, resolve app crashes, improve overall app usability, and analyze errors and bugs occurring the app.

In addition, we will measure the app usage and performance. We will use data on user interactions on an aggregated level or in anonymized state to measure and improve the performance of the app and the services.

Our legal basis is our legitimate interest in maintaining and improving the performance and security of the application. We have conducted a balancing test to ensure that our interests do not override your fundamental rights and freedoms.

Please note: event-based analytics described in this privacy notice are not essential to the core functioning of the application and are only activated with your prior consent.

Personal data processed to ensure application functionality and measure performance

The personal data we will collect to ensure application functionality and security is described below:

- Crash logs.
- User interactions with the application.
- Diagnostic data such as IT system problems, transaction performance, errors that may originate from user interaction with the app, but usually does not contain any user data.

The data used for measuring application and service performance is user interactions with the app. The data shall be used on aggregated level or anonymized state.

As this data is not personal, it falls outside the scope of the GDPR. If personal data is used, the legal basis is our legitimate interest.

Personal data processed to provide you services

In order to provide you with services that do not require you to register account with Circle K, we shall process the following data:

- Geolocation of the user.
- Language preferences.

Circle K does not access or collect this data, and it remains on your device only. As such, this information does not fall within the scope of the General Data Protection Regulation (GDPR).

However, access to or storage of such data on your device may fall under the scope of national implementations of the ePrivacy Directive (2002/58/EC). In accordance with Article 5(3) of the Directive, access to device information requires your consent, unless such data is strictly necessary to provide a service explicitly requested by you. In this application:

- Language preference data is used solely to present the interface in your selected language and is strictly necessary for basic app functionality.
- Geolocation data is used to display nearby stations or services and is only processed on your device. It is not transmitted to Circle K.

Therefore, Circle K relies on the “strictly necessary” exemption under the ePrivacy Directive for processing this information locally. Should future updates involve accessing or transmitting this data, we will obtain your consent in accordance with applicable law.

4. Analytics and Usage Tracking

With your consent, we process information about your interactions with the app interface to better understand how users engage with our features and improve the app's design, performance, and usability. This information is used exclusively for aggregated analytics and may include pseudonymous data, but not directly identifying information (such as names, account credentials, or real-time GPS location). However, some analytics tools may use pseudonymous identifiers (e.g., app instance IDs) to associate events with specific app installations. These identifiers do not directly identify you, but may qualify as personal data under applicable laws. We track categories of actions such as:

1. Screen & UI Interactions (e.g., screen views, tab switches, filters applied)
2. Promotional & Onboarding Events (e.g., promo displays, onboarding messages)
3. Location Feature Usage (e.g., navigation buttons, map interactions)
4. Route Planning & Search (e.g., route creation, search input)
5. App & Settings Management (e.g., changing language, switching modes)
6. Error Reporting (e.g., failed API requests)

These events are processed using analytics technologies, such as software development kits (SDKs - tools integrated in the app code) provided by third-party analytics services and integrated into the app. We do not collect or transmit directly identifying information for analytics purposes. Third-party analytics providers may process pseudonymous identifiers to associate aggregated event data with a specific app instance. Currently, we use Google Analytics and Sentry as our third-party analytics providers.

The legal basis for this processing is your consent, in accordance with Article 6(1)(a) of the GDPR and Article 5(3) of the ePrivacy Directive. These third-party analytics providers act as data processors on our behalf. You can manage your consent preferences at any time within the app settings.

5. What are your rights? [🔗](#)

Exercising your rights

You may exercise your rights as a data subject, including the right to object, right to restrict processing, or ask us questions by contacting Circle K via e-mail, phone, or post, or through the Circle K ID page: [🔗 Circle K](#). The contact details are available in paragraph 10 of this statement. Some requests, like access to data, specific question related to data analysis as such or any other question you can request further access needs to be made in writing.

Right to information

These terms and conditions constitute the special information about how we will process your personal data and what data will be processed as part of the Services and supplement the general Circle K Privacy Policy which is available on: [🔗 Privacy Policy | Circle K](#).

Access to data

You have the right to at any time request from us a copy of the information about you that we store. Such request shall be in writing. If you have specific question related to data analysis as such or any other question you can request further access. Request for access to data shall be made in writing, see more at [🔗 Circle K](#).

Right to data portability

You have the right to ask that we transfer the information you gave us to another. This only applies to information you have given us. Commercially sensitive information that was created based on your anonymized data shall not be transferred.

Rights related to profiling and automated decision-making

You have right not to be subject to a decision based solely on automated processing, including profiling. You may submit an objection to any automated decision we have made and ask that a person reviews it.

Deletion of personal data

You have the right to request deletion of some parts of your personal data. Some data, such as transactions must be retained in accordance with local jurisdiction requirements.


If you choose to delete your personal data and terminate your account, many of the application services will not be available to you, and you may continue using this application only as a guest. If you wish to continue using the majority of the services, you will have to register again.

Right to object

You may have the right to object to processing if we are processing your information on the basis of legitimate interests. You may submit an objection to any automated decision we have made and ask that a person reviews it.

Right to restrict processing

You have the right to ask us to restrict the processing of your information in certain circumstances. This means that your data can only be used for certain things, such as legal claims or to exercise legal rights.

You may exercise your right to restrict processing by contacting Circle K via e-mail, phone, or post, or through the Circle K ID page:  . The contact details are available in paragraph 10 of this statement.

Right to withdraw consent


If we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time.

Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. You can manage your consent settings within the app.

If you have consented to analytics tracking, you may withdraw this consent at any time within the app settings. Disabling analytics will not affect your ability to use core functionalities of the app.

Dispute resolution

Should you have any concerns related to personal data processing, you may reach out to Circle K's Data Protection Officer at privacy@circlekeurope.com to resolve the issue.

You may also contact your local Data Protection Supervisory Authority if you wish to lodge a complaint. Contact details can be found here:  [Our Members](#) | [European Data Protection Board](#)

6. Data processors and transfer of data

We may process some of the personal data in our internal systems that we use in order to maintain our business. In most cases are supported either by Microsoft, Oracle, or other partners specializing in ICT services.

The categories of recipients of your personal data include:

- IT infrastructure providers (e.g. cloud hosting, platform management) such as Microsoft and Oracle, acting as data processors under our instructions.
- Application analytics providers, engaged to help us understand application performance and improve usability.
- Internal Circle K departments (e.g., customer service, technical support), for operational purposes.

All recipients are contractually bound to process personal data only in accordance with applicable data protection laws and our instructions.

Circle K datacenters, and datacenters of our partners enabling you to receive Circle K ID services generally are located in EU / EEA, or in countries recognized by European Commission to provide an adequate level of data protection. In case Circle K shall engage partners from other countries outside of EU / EEA (also known as “third countries”), Circle K shall ensure that relevant data protection procedures are in place to comply with applicable data protection laws, such as but not limited to GDPR.

Where personal data is transferred outside the EU/EEA to countries not covered by an adequacy decision of the European Commission, we implement appropriate safeguards such as the European Commission's Standard Contractual Clauses (SCCs). You may request a copy of these safeguards by contacting us at privacy@circlekeurope.com.

7. Personal data retention [🔗](#)

Circle K will retain user data for as long as necessary for the purposes for which the data was originally collected. This means that we will retain different categories of data for different time periods depending on the data type, the service it relates to and the purposes for which this data was collected.

We retain your personal data only for as long as necessary to fulfil the purposes described in this privacy notice:

- Diagnostic data and crash logs: retained for a period of up to 12 months to enable troubleshooting and application improvement.
- Geolocation and language preference data: stored only on your device, not transferred to Circle K, and deleted upon app uninstallation.
- Transactional and service-related records: retained as required under local legal and tax regulations, generally for up to 6 or 10 years, depending on jurisdiction.

We periodically review the data we hold and securely delete or anonymize it when retention is no longer necessary.

8. Protecting your personal data and respecting privacy [🔗](#)

Circle K will not gather, use, or disclose any personal data about a customer who is not aligned with the original purposes and without ensuring an appropriate legal basis. We will never sell your data. Where analytics technologies are used, we ensure that only non-identifiable usage metrics are processed. These are collected solely for internal evaluation purposes and only after the user has granted consent. No data is shared with third-party ad networks or used for profiling. We will maintain the security and confidentiality of the information according to the relevant laws and industry standards, and we will ensure that only authorized personnel may access your personal data.

Likewise, we may grant our partners access to personal data. This will be done to the extent necessary to provide the support to us to maintain and administer the application and customer accounts.

Data that may be used for our research, scientific and business performance analysis purposes is anonymized so you cannot be identified from it.

Providing certain personal data (such as diagnostic logs) is necessary to enable technical support and maintain the functionality of the app. However, the use of most features of the Circle K Drive app does not require account registration, and you can use the app in 'guest mode' without providing identifying information. Failure to provide optional data (e.g., location data) may limit functionality, such as personalized content or services based on your location.

9. Updates to this statement [🔗](#)

We hope you will find this privacy statement easy to understand.

Data protection laws are important – they strengthen your rights and ensure fair and transparent information processing by organizations. While many of these rules may appear complicated, most of them derive from common sense and general respect towards each other and environment. We take our data protection responsibilities seriously, and we require the same from our partners.

We may periodically update this statement in order to improve it as a part of our commitment to protecting your privacy. For app users, an updated policy will always be available via App Store, Google Play and within the app.

10. Circle K Europe affiliate contact information [🔗](#)

Couche-Tard Circle K Deutschland GmbH & Co. KG governing organization in Germany:

By e-mail: privacy@circlekeurope.com

By post mail: Couche-Tard Circle K Deutschland GmbH & Co. KG, Jean-Monnet-Straße 2, 10557 Berlin, GERMANY

Circle K Nederland BV governing organization in Netherlands:

By e-mail: privacy@circlekeurope.com

By post mail: Bezuidenhoutseweg 273, 2594 AN The Hague, NETHERLANDS

Circle K Belgium SA governing organization in Belgium:

By e-mail: privacy@circlekeurope.com

By post mail: Circle K Belgium SA – Legal Service, Boulevard Anspach 1 box 2, 1000 Brussels, BELGIUM

Circle K Luxembourg SA governing organization in Luxembourg:

By e-mail: privacy@circlekeurope.com

By post mail: Circle K Luxembourg SA, GDPR Correspondent 310 Route d'Esch
L-1471 Luxembourg, LUXEMBOURG