



VALEO TEST CARS DATA CAPTURE PRIVACY NOTICE

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VALEO TEST CARS DATA CAPTURE PRIVACY NOTICE

Valeo (**Valeo, we, us or our**) equips its test cars with cameras to test products in real life environments. As our test cars drive on the roads, cameras collect photographs and videos in which your image may be captured. This may happen, for example, while you are walking on the street or driving a car alongside our test car. Even though these cameras may capture you, please be assured that we are not interested in identifying you, as a specific individual and solely focus on our technologies.

We take privacy very seriously. In this privacy notice we explain what data we capture and record with our test cars. This notice is meant for pedestrians and other people outside our test cars.

1. General principles

Valeo is committed to processing personal data in compliance with data protection regulations including the recent European Global Data Protection Regulation (here after “DPR”), and to respecting the rights of data subjects. When we develop, engineer and manufacture products that may trigger our obligations under the DPR, we take the principles of privacy and security by design into account at the time of engineering and developing such products. Valeo has in place a comprehensive data protection compliance programme that encompasses numerous policies, procedures, tools, forms and contractual clauses, as well as a detailed training and awareness program.

2. Who we are?

Valeo is the data controller of personal data which we collect with our test cars. Our headquarters are in Paris (43 rue Bayen, 75848 Paris Cedex, France) and we have operations in 33 countries around the world.

3. What personal data do we collect?

As a high-technology automotive company, we invest heavily in research and development activities in order to design and test our innovative products, technology and applications. This includes testing our products in real-life environments. As set out above, as our test cars drive on the roads, cameras within these test cars collect photographs and videos in which your image may be captured.

We collect these photographs and videos solely for the purpose of improving the ability of our products or systems embedded in test cars to distinguish between objects in their surrounding environments, and not for the purpose of identifying or making decisions about you as an individual. We apply stringent security measures to all personal data captured and we apply anonymization techniques to blur out your image from your surroundings. More information

about these measures is provided in the sections on “how do we use personal data” and “how do we secure personal data” below.

4. How long do we store your personal data for

Valeo will keep the recordings from our test cars in a secure environment for the time necessary to achieve the purposes for which it was collected or in accordance with any retention periods provided by applicable legislation including civil, criminal and commercial law. As a company developing security relevant technology in cars and tests, Valeo is subject to strict regulatory regimes which require us to retain product development data for a period of 15 years after the last relevant product has been offered on the market.

5. How do we use personal data?

We use the photographs and videos captured by our test cars in support of our research, analysis or verification exercises. Specifically, we analyse these photographs and videos to understand the movement and behaviour of pedestrians or other drivers on the street, so as to develop and train detection sensors to be used in new vehicles (which might be sold by us or by other car manufacturers), as well as the artificial intelligence technology used in connection with our products and services.

In all cases, the images we capture will never be correlated with other data that would allow us to identify you, nor used to make any decisions about you. We are not interested in identifying you, nor do we allow anyone else to identify you with our images. The images will only be used for technical statistical purposes in order to develop and enhance products and for scientific research aimed at improving artificial intelligence and all related technologies.

Valeo has developed specific protocols to manage the collection, transfer, and use of personal data collected during these tests, including by applying robust confidentiality and security measures to the data. Valeo will apply anonymization techniques to the images (e.g. by blurring out any persons present in these images) before analysing them unless it may have an impact on the quality of the images and on the tests results.

6. What legal basis do we have for processing your personal data?

As set out above, we apply anonymization techniques to the photographs and videos captured by our test cars and, therefore, we do not consider that these contain personal data. In the limited cases where we might retain details that would allow us to identify an individual, we rely on the following legal grounds:

We process the personal data contained in any photographs or videos collected by our test cars because it is necessary for the purposes of complying with legal obligations to which we are subject in relation to product safety. We also process this data in order to pursue our legitimate interests in ensuring the compliance of our products with technical requirements and specifications or with safety requirement, improving our products including assessing their performance and reliability in real-life environments. Finally, we may use personal data

captured by our test cars for scientific research purposes, where the applicable jurisdiction allows us to do.

7. How do we share personal data?

Other Valeo companies: Valeo is and acts as a global company. Your personal data may therefore be processed by Valeo employees located in your country, but also by employees at other Valeo companies located in other countries. Regardless of where these employees are located, such data will be subject to Valeo's Data Protection Compliance programme and will be treated with the same level of care and attention throughout the Valeo organisation. Valeo's Data Processors: Where Valeo needs to outsource the processing of personal data to a third party provider, the data processor is carefully selected and bound by data processing agreements which require it to only use personal data for clearly identified purposes. The data processor's personnel are also subject to strict non-disclosure agreements and training.

Other third parties: We may disclose personal data for the purposes we explain in this notice to our advisors (e.g., legal, financial, business or other advisors) and third parties permitted by law (e.g., the police, regulators, government agencies, or to judicial or administrative authorities). We may also disclose photographs or videos captured during test drives of our products (but not names or other types of personal data) to members of the research and development community in the field of driverless cars technology for the purposes of allowing them to analyse these images for their own purposes and sharing their findings with us to improve the safety of the technology in this field as a whole. These engineers are also subject to strict non-disclosure agreements and terms of access. If you wish to see a list of members of the community with whom your personal data might have been shared, please contact our Data Protection Officer whose details are set out in the section titled "how to contact us?".

Data export: In each case, where the sharing of personal data requires Valeo to transfer such data outside of the European Union, all necessary safeguards are implemented to maintain the protection of your personal data, including by entering into EU Commission-approved international data transfer clauses. If you wish to receive a copy of such clauses, please contact our Data Protection Officer whose details are set out in the section titled "how to contact us?".

8. How do we secure personal data?

We are committed to ensuring data security, confidentiality and integrity. We seek to anonymise or pseudonymize personal data collected as part of our research, development and testing activities.

Our global Data Protection Compliance programme includes training, controls, policies, procedures and guidelines that help us develop and maintain cultural, organisational, physical and technical measures to ensure the security of your personal data.

The programme includes:

- ▶ The Valeo Data Protection Principles

- ▶ The Valeo Business Partner Code of Conduct under which business partners and providers must commit to treat personal data as confidential information
- ▶ The Data Processor Policy which imposes on data processors contractual terms consistent with the GDPR
- ▶ The Valeo Policy for International Transfer of Personal Data which requires Valeo employees to ensure that Valeo enters into EU Commission-approved international data transfer clauses which are mandatory where data is transferred outside of Europe
- ▶ The Valeo Personal Data Breach Notification Procedure
- ▶ A Test and Pilot Products Data use protocol
- ▶ Non-disclosure agreements
- ▶ Mandatory training programs
- ▶ Tools and methods
- ▶ Audits and controls

The program is supported by a global multidisciplinary team.

In addition, the Data Protection Office, the Information Security Office and the Information System Department collaborate closely to provide adequate security to the personal data we process.

For example, we have specific measures and plans:

- ▶ To protect data against accidental loss
- ▶ To prevent unauthorised access, use, destruction or disclosure
- ▶ To ensure business continuity and disaster recovery
- ▶ To restrict access to personal information
- ▶ To conduct privacy impact assessments in accordance with the law and our business policies
- ▶ To train staff and contractors on data security
- ▶ To manage third party risks through the use of contracts and security reviews

We also have the following policies in place:

- ▶ Valeo Internal Security Policy
- ▶ Valeo Confidentiality Image and Social Media Policy
- ▶ Valeo IS Security Policy which is applicable to external partners

Please note this list is not exhaustive.

9. Your rights in relation to personal data

Where the collection of your personal data results from on-the-road recordings, our recording vehicles endeavour to notify data subjects of the fact that their images are being captured, which allows them to access the relevant privacy notices issued by Valeo and to further understand the purpose of such data collection and how it is processed.

As per the GDPR, you may also have the right to request:

- ▶ **Access to your personal data:** you can ask to access the following information:
 - a) The purposes for which we process your personal data
 - b) The categories of the personal data concerned
 - c) The recipients, or categories of recipients, of the data, if any, in particular any third countries or international organisations
 - d) The length of time that the personal data will be stored for (or the criteria used to determine that period)
 - e) Whether the personal data will be subject to automated processing, including profiling and, if so, the logic and potential consequences involved
 - f) Where the data is transferred to a third country or international organisation, information about the safeguards that apply; and/or
 - g) Information about the source of the data, if not obtained directly from you
- ▶ **Withdrawal of consent:** you may withdraw consent where it was the basis for processing your personal data
- ▶ **Correction of your personal data:** where personal data is inaccurate you have the right to request/claim that it be corrected and that incomplete personal data be completed based on information you may provide
- ▶ **Erasure, also known as “the right to be forgotten”:** you have the right to require Valeo to erase personal data without undue delay where one of the following applies:
 - a) The personal data is no longer necessary for the purpose for which it was collected
 - b) Consent is withdrawn and there is no other legal ground for processing
 - c) You object to the processing of the personal data; or
 - d) The personal data has been unlawfully processed
- ▶ **Processing restriction:** you can exercise the right to ask us to restrict the processing of your personal data in one of the following circumstances:
 - a) You contest the accuracy of the data; or
 - b) You need the data for legal claims
- ▶ **Automated decision-making:** we do not use automated decision-making and profiling tools, but in the event that this changes, you have the right to not be the

subject of automated decision-making where the decision has a significant effect on you, and can insist on human intervention

- ▶ **Data portability:** you have the right to request/claim that your personal data be provided to you in a "structured, commonly-used and machine-readable format" and to transfer that data to another party e.g. service provider. This applies to personal data for which processing is based on your consent and the processing is carried out by automated means. Where feasible, you can also request/claim that the personal data be transferred directly from our systems to those of another provider
- ▶ **The right to lodge a complaint with a data protection regulator:** you may file a complaint with the data protection regulator in the jurisdiction in which you are based. In France, this is the Commission Nationale Informatique et Libertés, and in the UK this is the Information Commissioner's Office

You can exercise the rights set out above by writing to us at our registered office address or by sending an email to dpo.external@valeo.com. Your exercise of these rights is subject to certain exemptions including to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and ask you for a proof of identity document and, if necessary, any further information needed to process your request.

10. How to contact us?

Should you have questions or concerns about data protection, your personal information, or should you wish to file a complaint, please contact Valeo's Global Data Protection Officer (based at its Paris headquarters) whose details are:

Valeo Management Services

Global Data Protection Officer
43, rue Bayen
75848 Paris Cedex
France

Email: dpo.external@valeo.com

Valeo's Whistleblowing System is also available to anyone who has reason to believe that Valeo's Data Protection Compliance programme is not being complied with or who wishes to report potential violations of law in relation to this programme:

By mail: valeo@expolink.ce.uk

On Expolink's website: www.expolink.co.uk/valeo

By placing a request or claim with the Data Protection Office: dpo.external@valeo.com

ETHICS & COMPLIANCE

<https://smartworkplace.apps.valeo.com/ethics-and-compliance-portal/home>

www.valeo.com

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