

Privacy Policy for Public Road Test

Note: This “Privacy Policy for Public Road Test” is published on the website by Subaru Europe N.V./S.A. at the request by and on behalf of SUBARU CORPORATION.

This “Privacy Policy for Public Road Test” (“Policy”) is an explanation by SUBARU CORPORATION (“Company”), to persons who are in the European Economic Area (the “EEA”) protected under the General Data Protection Regulation No. 2016/679 (the “GDPR”) regarding how the Company collects and processes personal data in the course of public road tests (“Personal Data”) as a data controller.

1. Personal Data to Be Processed

The Company processes (“process” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, ensure or destruction; hereinafter the same) the Personal Data, including but not limited to the following information:

physical data such as facial image of pedestrians, license plate number, and other personal data recorded on public road.

The Company records pedestrians and license plates in a purely random manner without any intent to identify specific natural persons.

2. Purpose of Use of Personal Data and Legal Basis

The Company processes the Personal Data to accomplish the following purpose based on the following legal basis.

Purpose: Planning, evaluation, research, development, manufacturing, and quality assurance of the Company’s current and future advanced drive assistance system products and service.

Legal Basis: Legitimate interests in development of Company’s current and future products, as long as this is carried out in compliance with data protection regulations. Developing advanced drive assistance system products and service will aid in the prevention to damage of vehicles and injuries of persons, such as by automatically detecting obstacles and provide more comfortable and

convenient future mobility. The balancing test between the interests of the Company and your interests has been carried out and is accessible upon your request. Please contact us at the following contact information in the Section 8 below.

If the Company processes the Personal Data for any other purpose incompatible with the aforementioned purposes, the Company will notify the additional purpose of use and other matters necessary under the laws in advance and get consent of the data subject of the Personal Data.

The Company promptly erases the Personal Data if it is no longer necessary for the aforementioned purposes.

3. Provision to Third Party

The Company will provide its subsidiaries and affiliates and its subcontractor, which are the developer of the advanced drive assistance system products and service, with the Personal Data for the purpose of accomplishing the aforementioned purposes.

A third party to whom the Company provides the Personal Data includes a party located in a country outside the EEA. The Company guarantees the adequate measures are ensured with respect to the protection of the Personal Data, such as by entering into Standard Contractual Clauses and/or a data processing agreement in accordance with the GDPR, when providing a third party located in a country outside the EEA with the Personal Data.

4. Ensuring of Accuracy

The Company endeavors to keep the Personal Data up to date and if it is inaccurate or insufficient, rectify it.

5. Security

To prevent unauthorized access to the Personal Data or divulgence of Personal Data, the Company takes personnel, organizational and technical safety management measures that are necessary and appropriate according to the risk of breach of the Personal Data, sets the process to inspect and correct such safety management measures as necessary, and makes ceaseless effort to improve security.

6. Data Subject's Rights

You may request the Company make your Personal Data retained by the Company available to you, rectify, erase or restrict the processing of such information. Further, you have the right to raise an

objection to the Company with respect to the processing of the Personal Data. If you require the procedures for exercising various types of rights granted to you with respect to the Personal Data, please contact us at the following contact information in the Section 8 below.

Please note that the Company records pedestrians and license plates in a purely random manner without any intent to identify the specific natural persons. Therefore, we need to know additional information (such as the exact time, date and place of the video recording) in order to respond to your requests.

If you are not satisfied with the way in which the Company have proceeded with any request, or if you have any complaint regarding the way in which the Company process your Personal Data, you may lodge a complaint with a Supervisory Authority, in particular, in the Member States of your habitual residence, place of work or of an alleged information of the GDPR.

7. Amendment to this Policy

The Company may amend this Policy at any time and the amended privacy policy shall become effective when the period two (2) weeks set aside to publicize the amendment ends.

8. Inquires

If you have any matter for consultation or question with respect to this Policy or the collecting and processing of the Personal Data by the Company in the course of the public road tests, please contact us at the following contact information.

Contact Information:

Subaru Europe N.V./S.A.

In attention of the Data Protection Team

E-mail Address: privacy@subaru.eu

This Policy was last updated on May 1, 2019.

SUBARU CORPORATION
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