

Enacted on September 30, 2025

Astemo Privacy Policy Regarding Data Collected by Onboard Cameras in Japan

1. About this policy

Astemo, Ltd. (“Astemo”, “we”, “us”, and “our”) drives test vehicles and uses on-board cameras in order to collect images around the test vehicles and records the images on the storage devices installed in the test vehicles, for the purpose of developing our products and services. Such collected images may include your personal information as described in Section 2.

In this privacy policy (this “Policy”), we have provided a basic policy regarding your personal information which may be contained in the images collected by on-board cameras in Japan. When handling personal information, we are committed to complying with applicable laws and regulations in Japan and overseas, as well as other guidelines and to handle personal information appropriately based on this Policy and our internal rules.

2. Personal information we collect

We collect personal information by driving test vehicles on public roads in Japan and recording images around the test vehicles using on-board cameras. The images (the “Recorded Images”) may contain personal information visible from public streets, such as appearances and behaviors of passers-by, as well as their whereabouts and date and time, surrounding conditions around the test vehicles and/or the license plates of vehicles.

3. Purpose of the use of personal information which we handle

The purpose of collecting the Recorded Images is to develop an Advanced Driver-Assistance System (“ADAS”) and related to products and services.

4. Security control measures concerning personal information which we handle

We take necessary security control measures for the prevention of any leakages, losses or damages of personal information which we collect, as well as take appropriate measures to manage the personal information. We provide training for our officers and employees on the protection and the appropriate handling of personal information. We also separately determine the period for which we retain personal information depending on the purpose of use and disposing of personal information in an appropriate manner after the expiration of such period.

5. Provision of personal information which we handle to a third party

Except for any of the following cases, we do not provide the Recorded Images to any third party without obtaining prior consent of the data subject.

- (i) Cases in which we entrust the handling of the Recorded Images in whole or in part within the scope necessary for the achievement of the purpose of use
- (ii) Cases in which the Recorded Images are provided as a result of the succession of business due to merger or otherwise
- (iii) Cases in which other applicable laws and regulations permitted

6. Provision to a third party located in foreign countries

Except for any of the following cases, we do not provide the Recorded Images to any business or any other third party outside Japan including subcontractors and joint users without obtaining prior consent of the data subject.

- (i) Cases in which a third party is located in any of the countries prescribed by laws as a country that has established a personal information protection system recognized to have equivalent standards to that in Japan
- (ii) Cases in which a third party establishes a necessary system for continuously taking measures equivalent to those that a business operator in Japan must take (hereinafter, the "equivalent measures")

- (iii) Cases in which other applicable laws and regulations permitted

In the case of the item (ii) above, we take necessary and appropriate measures in order to ensure that a third party continuously take the equivalent measures. If you would like to know the details of these measures, please make a request according to Section 7 below.

7. How you request to disclose, etc. of personal information

- (i) You may request that we disclose your personal information we hold.
- (ii) You may request that we make a correction, addition or deletion on the content of your personal information we hold.
- (iii) You may request that we cease to use your personal information we hold.
- (iv) You may request that we provide you with information about the measures for the protection of your personal information

Once you make a request, we will promptly respond to the extent reasonable according to the procedures in this Policy.

8. Continuous improvement of this Policy

We will review this Policy from time to time in order to maintain the appropriate handling of personal information and continuously improve our personal information handling system and operation method to meet the needs of the times. In addition, when laws and regulations related to the protection of personal information are enacted and further amended, we will establish a system in accordance with the contents each time. We may change the contents of this Policy, system and operation method at any time without obtaining prior consent of data subjects, except as required by laws and regulations.

If we change this Policy, we will post the changed policy in a place we deem appropriate in this Policy and on our website.

9. Inquiries about this Policy and handling of personal information

For inquiries about the requests described in Section 7 above or this page (this Policy), please fill out the inquiry form in the linked page below.

[Inquiry About Personal Information Protection](#)