Enacted September 30, 2026

Astemo Privacy Policy Regarding Data Collected by On-board Cameras in Canada

1 About this policy

Astemo, Ltd. ("Astemo", "we", "us", and "our") drives test vehicles in Canada, and uses on-board cameras in order to collect images around the test vehicles and records them 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. We currently expect to conduct test drives in the provinces of Alberta, British Columbia, Manitoba, Ontario, Quebec and Saskatchewan between October 1, 2026 and December 31, 2026. Locations and scheduling are subject to change without notice.

In this privacy policy (this "Policy"), we have provided information regarding the processing of your personal information which may be contained in the images collected by on-board cameras. We are committed to respecting your privacy.

This Policy also describes your data protection rights, including the right to object to the processing which we carry out. More information about your rights, and how to exercise them, is set out in the Section 8.

2 Personal data we collect

The images collected by on-board cameras may include your personal information, such as the appearances of passers-by (physical and/or behavioural characteristics), the location, date and time associated with such passers-by, and the license plates of vehicles around the test vehicles.

3 Purposes of processing your personal information

We may process your personal information for the following purposes:

- To develop our products and services, in particular advanced driver assistance system

("ADAS") products with a view to enhancing vehicle safety and improving driving experience;

- To test new sensors and algorithms, and to create new products to monitor vehicle surroundings and provide alerts or automated interventions; and
- To cooperate with our partners in the automotive sector to advance industry-wide safety standards and technological capabilities.

4 Disclosure of your personal information to recipients

We may disclose your personal information to our affiliated and third-party service providers that process the images collected by on-board cameras on our behalf for the purposes described in Section 3, in particular to service providers who help us analyse collected images or provide us with cloud services we use for our development platform.

Where permitted by applicable law, we may also disclose your personal information to our partners including automobile manufacturers with whom we develop ADAS and related products and services for the purposes described in Section 3. In such cases, we will take all necessary measures required by applicable law, including entering into an agreement with a recipient of your personal information.

5 Security measures

We have in place security measures to secure your personal information stored on our storage devices and in our data servers.

In particular, we implement security measures such as (i) establishing internal rules for the processing of personal information, (ii) appointing a person to be in charge of managing personal information for each department that processes personal information, (iii) implementing security measures in accordance with the internal rules mentioned above, (iv) thoroughly informing and educating our employees in regard to such internal rules, and (v) supervising third parties to whom we disclose personal information in relation to the processing of your personal information collected in Canada.

6 Storage limitation of your personal information

We will retain your personal information only for the period necessary to fulfil the purposes we collected it for or to comply with applicable law, including for the purposes of satisfying any legal, regulatory, or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

7 Transfer of your personal information outside of Canada

We may transfer your personal information collected in Canada to other jurisdictions including Japan, India, Israel and the United States of America. While outside of your jurisdiction of residence, personal information may be subject to applicable foreign laws, which may permit government and national security agencies to access your information in certain circumstances. Such transfers of personal information will be protected by appropriate safeguards, including contractual measures.

8 Your rights

Under Canadian privacy laws, you may have certain rights in relation to your personal information, which may include the right to:

- Withdraw consent to processing at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

- Request access to your personal information, including requesting a copy of the personal information we hold about you, requesting information about the types of personal information we hold about you and the purposes for which it has been used, and requesting the names of the third parties to whom we have disclosed your personal information.

- Request that we correct inaccurate data or complete incomplete data, though we may need to verify the accuracy of the new personal information you provide to us.

- Request erasure of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Request the transfer of your personal information to you or to a third party. We will provide you, or a third party you have chosen, with your personal information in a structured, commonly used, machine-readable format.

The availability of these rights depends on your province or jurisdiction of residence and may be subject to one or more exceptions. For example, these rights may be limited if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

You may exercise any of your rights above by contacting us using the information about us indicated in Section 9 below.

We reserve the right to deny any request if we believe it is subject to one or more exceptions or if the request would violate any legal requirement. In order to protect your privacy, we take steps to verify your identity before granting access or other requests. We will only use personal information provided as part of a request to verify the requestor's identity or authority to make the request.

9 Contacts

For inquiries about this Policy, or if you wish to contact us for any reason in relation to our personal information processing, please contact our Privacy Officer at: data_protection_adas@astemo.com.

You may also fill out the inquiry form in the linked page below.

Inquiry Form About Personal Information

You have the right to make a complaint at any time to the appropriate Canadian privacy commissioner. However, we would appreciate the chance to deal with your concerns before you approach the applicable Canadian privacy commissioner, and request that you contact us in the first instance.

10. Updates to this Policy

We will post any updates we make to this Policy on our website. The date this Policy was last updated is identified at the top of the page. You are responsible for periodically visiting our website to check for any changes.