

Enacted on Oct 21, 2025

Astemo Privacy Policy Regarding Data Collected by On-board Cameras in the EEA and the UK

1 About this policy

Astemo, Ltd. (“Astemo”) and Honda Motor Co. Ltd., (“Honda”, Astemo and Honda are collectively, “we”, “us” and “our”), drive test vehicles in the European Economic Area (“EEA”) and the United Kingdom (“UK”), 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 data as described in Section 2.

In this privacy policy (this “Policy”), we have provided information regarding the processing of your personal data which may be contained in the images collected by on-board cameras. We are regarded as data controllers with respect to your personal data, and 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.

Astemo and Honda are joint controllers in regard to the processing of your personal data from the moment the images are collected until the moment all images are anonymised or deleted from solid state drives, Astemo’s data server and Honda’s data server.

Please also note that this Policy applies to the processing of your personal data by Astemo and Honda, irrespective of whether or not Astemo or Honda acts as the joint controller or as the sole controller.

2 Personal data we collect

The images collected by on-board cameras may include your personal data, such as the faces of passers-by (physical characteristics) and the license plates of vehicles around the test vehicles (identifiers).

3 Purpose and legal basis of processing your personal data

We may process your personal data in order to develop our products and services, on the legal basis that it is necessary for us to pursue our legitimate interests, such as developing ADAS products in particular to enhance their safety and improve driving experience; test new sensors and algorithms or creating new products to monitor vehicle surroundings and provide alerts or automated interventions, as well as cooperate with our partners from automotive sector to advance industry-wide safety standards and technological capabilities. For further details regarding our legitimate interests and balancing test, please contact us by using the contact information listed in Section 9.

4 Disclosure of your personal data to recipients

We may disclose your personal data to our affiliated and third-party service providers that process the images collected by on-board cameras on our behalf for the purpose 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 data to our partners – automobile manufacturers with whom we develop ADAS and related products and services. In such cases, we will take all necessary measures required by applicable law, including entering into an agreement with a recipient of your personal data.

5 Security measures

We have in place security measures to secure your personal data 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 data, (ii) appointing a person to be in charge of managing personal data for each department that processes personal data, (iii) implementing security measures in accordance with the internal rules mentioned above, (iv) thoroughly informing and educating its employees in regard to such internal rules, and (v) supervising third parties to whom we disclose personal data in relation to the processing of your personal data collected in the EEA or the UK.

6 Storage limitation of your personal data

We will retain your personal data only for the period necessary to process such personal data, except to the extent that we are required by law to retain it for a longer period of time, in which case, we will retain it for the period required by law.

7 Transfer of your personal data outside the EEA or the UK

We may transfer your personal data collected in the EEA or the UK outside of the EEA or the UK to Japan, which ensure an adequate level of protection according to relevant adequacy decisions issued by the European Commission. Whenever we transfer your personal data out of the EEA or the UK, to locations that do not provide an adequate level of data protection, in particular to Ukraine, India, China and the United States of America, we put in place appropriate safeguards to ensure your personal data is properly protected. These include the use of Standard Contractual Clauses approved by the European Commission, which contractually oblige the recipient to protect your personal data to the standards required by the GDPR. A copy of the relevant mechanism can be obtained for your review on request by contacting us using the information about us indicated in Section 9 below.

8 Rights of residents of the EEA or the UK

If you are a resident of the EEA or the UK, you have following rights:

- (1) Right to obtain information regarding the processing of your personal data and to access the personal data that we hold about you;
- (2) Right to request rectification of your personal data if it is inaccurate or incomplete;
- (3) Right to request deletion of your personal data in certain circumstances. This may include (but is not limited to) circumstances in which:
 - (a) It is no longer necessary for us to retain your personal data for the purposes for which we collected it;
 - (b) You object to our processing of your personal data in pursuit of our legitimate interests, and such legitimate interests do not override your own interests, rights, or freedoms; and
 - (c) Your personal data has been unlawfully processed by us;

- (4) Right to request that we restrict our processing of your personal data in certain circumstances. This may include (but is not limited to) circumstances in which:
 - (a) You dispute the accuracy of your personal data (but only for the period of time necessary for us to verify its accuracy);
 - (b) We no longer need to use your personal data except to establish, exercise, or defend legal claims;
 - (c) You object to our processing of your personal data in pursuit of our legitimate interests (but only for the period of time necessary for us to assess whether such legitimate interests override your own interests, rights, or freedoms); and
 - (d) Your personal data has been unlawfully processed by us, but you oppose the deletion of your personal data and instead request the suspension of its use;
- (5) Right to object to our processing of your personal data;

These rights may be limited, for example if fulfilling your request would reveal personal data 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.

The provision of your data is neither mandatory nor constitute statutory or contractual requirement.

You may also lodge a complaint with the competent data protection authority in the country where you reside in or the country of your place of work or the country where the alleged infringement took place if you believe that any of your rights have been infringed by us.

9 Contacts

For inquiries about this notice (Astemo Privacy Policy Regarding Data Collected by On-board Cameras in the EEA and the UK), or if you wish to contact us for any reason in relation to our personal data processing, please fill out the inquiry form in the linked page below.

[Inquiry Form About Personal Information](#)