

Enacted on April 20, 2025

Astemo Privacy Notice/Privacy Policy for Data Collection through On-Board Cameras in Thailand

Astemo, Ltd. (the “Company”, “we”, “us” and “our”) is committed to protecting your privacy and ensuring that your personal data is handled in compliance with the Personal Data Protection Act B.E. 2562 (2019) (PDPA). This privacy notice describes how we collect, use, disclose, and protect your personal data collected in Thailand as part of our project to develop our products and services aimed at improving pedestrian and road safety.

1. Purpose of Data Collection

We drive test vehicles and use on-board cameras in order to record live video footage of images around the test vehicles in Thailand and collect them on the storage devices installed in the test vehicles. Such images may include personal data. We collect such images through on-board cameras for the purpose of developing, testing and researching our products and services in the field of “advance driver assistance system” (ADAS”) to enhance pedestrian and road safety. This includes using data to monitor road conditions and develop innovative safety features that can help prevent accidents and protect pedestrians.

2. Types of Personal Data Collected

The personal data collected through on-board cameras may include video footage of pedestrians, drivers, passengers, vehicle license plates, and surrounding areas.

3. Legal Basis for Data Collection

The legal basis for processing your personal data is our legitimate interest in validating and enhancing the functionality of the ADAS. To enhance road safety and reduce risks of accidents by recognizing traffic participants and infrastructure, as well as supporting

driving processes by functioning as a driving aid.

4. Data Retention

We retain your personal data for a period necessary to fulfill the purposes of this project, but no longer than five years from the day when we start to collect such images in Thailand, unless required by law.

5. Data Disclosure

We engage our external service providers to process the personal data collected by on-board cameras for the purpose described in Section 1.

Where permitted by applicable law, we may also disclose your personal data to our external service providers.

We execute agreements (called Data Processing Agreements) with all external service providers that require them to safeguard your personal data and to process such personal data only as instructed.

6. Cross-Border Transfer of Personal Data

We may transfer your personal data collected in Thailand to locations outside of Thailand. Whenever such a transfer occurs, we implement appropriate safeguards, including contractual obligations, to ensure that your personal data is adequately protected in accordance with applicable data protection laws.

7. Data Protection Measures

We implement appropriate technical and organizational measures to safeguard your personal data, including encryption and secure data storage, to prevent unauthorized

access or disclosure.

8. Your Rights

Under the PDPA, you have the following rights regarding your personal data:

- **Right of Access:** You have the right to request access to and obtain a copy of the personal data related to you, which is under the responsibility of us.
- **Right to Data Portability:** You have the right to receive personal data concerning you from us. In this case, we arrange such personal data to be in the format which is readable or commonly used by ways of automatic tools or equipment and can be used or disclosed by automated means.
- **Right to Object:** You have the right to object to the collection, use or disclosure of the personal data concerning you, at any time.
- **Right to Erasure:** You may request us to erase or destroy your personal data or anonymize the personal data to become the anonymous data which cannot identify you.
- **Right to Restriction:** You have the right to request us to restrict the use of personal data.
- **Right to Rectification:** You have the right to request us to ensure that your personal data remains accurate, up-to-date, complete, and not misleading.
- **Right to File a Complaint:** If there is reason to believe that we, our contractors, including the employees or the service providers of us violate or do not comply with the PDPA or notifications issued in accordance with the PDPA, you have the right to file a complaint.

To exercise any of these rights, please contact us using the contact information described in Section 9.

9. Contact Information

If you have any questions or requests regarding your personal data, please contact us at:

[Inquiry Form About Personal Information](#)