



1. Privacy Policy for Mobile Applications

This Privacy Policy describes how **IDIADA Automotive Technology, S.A.** (hereinafter " **IDIADA** " or " **We** ") treats your personal data, and the manner in which We use and protect it, as well as the rights that you hold in relation to it. In this sense, IDIADA informs you that it will collect and process personal data in its capacity as Data Controller.

" **Personal Data** " means all information about an identified or identifiable natural person ("Data Subject"); is considered a Data Subject any person whose identity can be determined, directly or indirectly, in particular by means of an identifier, such as a name, an identification number, location data, an online identifier or one or more elements specific to physical, physiological, genetic, psychological, economic, cultural or social of said person. In this sense, IDIADA informs you that it will process your personal data regarding your geolocation and the identifier (ID number) that the Application has randomly created. However, although IDIADA has your geolocation and the ID you have assigned, in no case may relate these two elements to know your identity because this number of ID changes continuously either each time you access the application or when you finish your interaction with each traffic event that has been informed by the application. IDIADA assures you that the time period during which you are assigned an ID number it will not sustain more than five (5) minutes.

In relation to the aforementioned, you can contact us through:

Applus + IDIADA Automotive Technology, S.A.

Address: Pol. Industrial L'Albornar Po BOX 20

Telephone : 977 16 60 00

Email : data_protection@idiada.com

1. **What Personal Data We Collect**

Every time you use the application you will be assigned a random and anonymous ID number IDIADA only have access to your personal data (your geolocation) when approaching a traffic event (e.g. road works, traffic jams, accidents, etc .) to send you notifications of the referred traffic event. These proximity data to traffic events will be used to analyze the safety and efficiency of the roads and the environmental impact.

1.1 **How We use and with what legal basis We treat your Personal Data**

We use and process the Personal Data that We collect about you for the purposes and with the legitimating bases indicated below:

- a) Improve and customize the application;
- b) To administer our Application;
- c) To protect the security and / or integrity of the Application and IT infrastructure;



- d) Provide traffic alert services. For example, IDIADA may notify you of the existence of radars, dangerous traffic points, works, traffic, etc. In order to provide this service, IDIADA will collect information about your geolocation.
- e) Monitor your behavior regarding traffic alerts that arise during your travel in order to "profile" your behavior. However, IDIADA assures you that in no case We will be able to know your identity or any other personal information other than your geolocation, since at the time of downloading the Application and each time you open it, you will be assigned a random ID number and anonymous that will constantly change. IDIADA informs you that the purpose of monitoring your behavior is to analyze your reactions to road situations of all kinds, in order to obtain driving parameters to improve road safety, the efficiency of traffic, the control of road incidents, the reduction of the environmental impact and an improvement in the protection of vulnerable users of the road network (cyclists, the elderly, children, people with disabilities, etc.).
- f) For any communication to third parties, as necessary as part of *due diligence* processes in the context of business restructuring operations of which We are part;
- g) Communications to third parties when necessary for the proper functioning of the Application or when your express consent is requested.

When IDIADA processes Personal Data based on your legitimate interests, We will always perform a balance test in order to ensure that your interests or your fundamental rights and freedoms do not prevail over our legitimate interest and implements rigorous guarantees to ensure that your privacy is protected accordingly. Likewise, if we request your consent to process your Personal Data, you may revoke said consent at any time by contacting us by:

- a) An email to the address data_protection@idiada.com, including your specific name and email address; or
- b) Sending a written notification to our post office box ; Pol. Industrial L'Albornar Po BOX 20, E-43710, Santa Oliva, Tarragona (Spain) with the reference subject "*Exercise of data protection rights* "

1.2 Information on Geolocation

Insofar as the Application offers services that need to know your geolocation, IDIADA will collect and process this data to provide said services. IDIADA will not access your geolocation based on your GPS without your consent.

For the above, IDIADA informs you that for the correct provision of the service it will be necessary for you to have your GPS activated at all times.

1.3 What rights do you have over your Personal Data



You have certain rights in relation to your Personal Data, without prejudice to the provisions of local legislation. Such rights include:

- a) Know how of how We are treating your Personal Data and access to this Personal Data;
- b) Request the rectification of inaccurate or incomplete Personal Data;
- c) Request the deletion of your Personal Data when this is no longer necessary for the purposes for which it was collected, in accordance with applicable legislation;
- d) Limit the processing of your Personal Data, under certain circumstances (in which case we will only process Personal Data for the exercise and / or defense of IDIADA's rights);
- e) Oppose the processing of your Personal Data, considering certain circumstances and for reasons related to your particular situation (in which case we will only process Personal Data for imperative legitimate reasons or for the exercise and / or defense of IDIADA's rights);
- f) This includes your right to object, at any time, for reasons related to your particular situation, to the processing of your Personal Data on the basis of our legitimate interests or that of a third party, in which case we will stop processing your Personal Data unless that we can rely on legitimate reasons for this.
- g) Exercise your right to data portability, which will allow you to receive and reuse Personal Data in an electronic format usable for your own purposes and for different services without impediment to its use, including transmission to a third party.

We recommend that you contact us to update or correct your personal information as soon as it changes, or if the Personal Data we have about you is inaccurate.

IDIADA agrees to protect your Personal Data as set out in this Privacy Policy, and under applicable law. If you have any questions or want to request additional information on how to exercise your rights, do not hesitate to contact us at the following email: data_protection@idiada.com .

1.4 How We share your personal data and with whom

IDIADA will share your Personal Data with third parties in the following circumstances:

- a) Companies belonging to the Applus + group: IDIADA collaborates closely with other companies belonging to the Applus + Group. However, we will share your information with them only when strictly necessary.
- b) Security forces and bodies, judges and courts, regulatory entities, government authorities or other competent third parties: we can share your Personal Data with these third parties when we deem it necessary to fulfill a legal or regulatory obligation, or to protect in any other way our own rights as well as the rights of third parties. Likewise, we will share your information, only when



necessary with the *partners* of the European project C- MOBILE and with the European Commission for the correct provision of the service, for the improvement of road safety and efficiency of the roads, for the investigation of environmental impacts and traffic.

- c) Buyers of assets and merger: We will share your Personal Data with any third party that buys, or to which we transfer, all or almost all of our assets and businesses or with those with whom we carry out a merger, consolidation, integration or similar restructuring. In the event of such sale or transfer, we will use all reasonable efforts to ensure that the entity to which we transfer your Personal Data treats it consistently with this Privacy Policy.
- d) Other third parties: We will only share information with third parties if you provide your unequivocal authorization.

1.5 How We protect your Personal Data

We implement technical and organizational measures to guarantee a level of security appropriate to the risk for the Personal Data processed. These measures are intended to guarantee the continued integrity and confidentiality of Personal Data. We periodically evaluate these measures in order to guarantee the safety of the treatment.

1.6 How long do We keep your Personal Data

We will keep your geolocation Personal Data for the period of time that is necessary to analyze your behavior on public roads.

In the event that there is information that, for technical reasons, we cannot completely remove from our systems, we will take the appropriate measures to prevent any further treatment or use with respect to the collected data.

1.7 Contact us

IDIADA is the Data Controller in relation to the Personal Data that we collect and process. If you have questions or concerns about the processing of your Personal Data, please contact us by email at data_protection@idiada.com , including your full name and email address, or by written communication to IDIADA Automotive Technology , S.A., PI L'Albornar , PO BOX 20, E-43710, Santa Oliva, Tarragona (Spain).

We are committed to collaborate with you to obtain a fair resolution with respect to any claim or doubt related to privacy. However, if you consider that we have not been able to help you with your claim or doubt, you will have the right to file a claim with the relevant authority for Data Protection.

1.8 Changes to this Privacy Policy

You have the right to request a copy of this Privacy Policy using the contact information indicated above. This Privacy Policy is subject to change, as deemed necessary.



In the event that we modify this Privacy Policy, We will notify you of the changes. In those cases in which the changes to the Privacy Policy have a fundamental impact on the nature of the treatment, or in some other way have a substantial impact on you, We will notify you in advance so that you have the opportunity to exercise your rights (for example, between or others, oppose the treatment).

Likewise, and to the extent that IDIADA relies on consent to carry out any of its treatment activities, we will ensure that you request your consent when the aforementioned changes may have a substantial impact on the treatment in question, before such changes become effective.

9 OF MARCH 2020