

General Data Protection Policy

1. Introduction and scope

This General Data Protection Policy (the “Policy”) applies to the processing of personal data by Effitrax.

Effitrax considers protecting the personal data of all customers and business partners to be an important priority. This includes consumers as end-use customers and employees in their role as contact persons and representatives in the context of a business relationship.

Effitrax is committed to processing Personal Data responsibly and in compliance with the applicable data protection laws in all countries in which Effitrax operates. This Policy describes the types of Personal Data Effitrax collects, how Effitrax uses that Personal Data, with whom Effitrax shares your Personal Data, and the rights you, as a Data Subject, have regarding Effitrax’s use of the Personal Data. This Policy also describes the measures Effitrax takes to protect the security of the data and how you can contact us about our data protection practices.

2. Contact details of the Data Protection Officer (DPO)

The DPO is involved in all issues related to the protection of your Personal Data. In particular, the DPO is in charge of monitoring and ensuring compliance with this Policy and the applicable data protection laws. For any comments or questions you may have regarding this Policy, please contact the DPO of Effitrax Mr. Bernard Berkein at Bernard.berkein@effitrax.com, or at the following address:

EFFITRAX BV
Attn. Bernard Berkein
Stasegemsesteenweg 82b
B-8500 Kortrijk

3. Categories of Personal Data processed

We process the following Personal Data for a number of business purposes that we list further below:

- › General identification information – Effitrax may process your name, contact information (including address, phone number and mobile phone number), citizenship and country of residence, date of birth, gender and languages spoken.

- › Professional information – Effitrax may process information related to your profession including (without limitation) your job title, professional email address and phone number and your role/responsibility.
- › Financial information – Effitrax may process financial information including (without limitation) your bank account number, credit card number, bank details and VAT number.
- › Visitor information – Effitrax may process your name, contact details and car license plate when you visit Effitrax premises.
- › Information you choose to share with Effitrax – Effitrax may process Personal Data you choose to share with Effitrax, including (without limitation) information you share when you contact our customer support service.
- › Information relating to sourcing and procurement – when you provide services or sell products to Effitrax or when Effitrax provides services or sells products to you, Effitrax may process information necessary for the provision of the services or the selling of the products including (without limitation) your contact details and financial details.
- › Warranty information – Effitrax may process your name, contact details, financial information and information on the product(s) purchased when you submit a warranty request.
- › CCTV footage – Effitrax may process footage of you obtained through our use of CCTV surveillance systems at our premises. For more information, please consult the specific data protection Policies displayed at our premises.
- › Survey results – Effitrax may process your responses to questions in our customer surveys.
- › Passwords or other personal identifiers – Effitrax may process the password or other personal identifier that you use when you register on a Effitrax website, platform or device and help you register if you forget such password or personal identifier. For more information, please consult the specific data protection Policies of the respective Effitrax website, platform or device.
- › Proof of identity – Effitrax may, in certain circumstances, ask for a copy of your identity card or other proof of your identity (e.g. E-ID, driver’s license) when

- you send a data privacy request to Effitrax.
- > Website information – Effitrax may process information related to your use of Effitrax websites including (without limitation) your browser type and version, your browsing history and the pages you accessed on a Effitrax website. For more information, please consult the specific data protection Policies of the respective Effitrax website.
- > Data from an end-use customer’s vehicle consisting of the vehicle identification number (VIN), the license plate number, as well as transmission records and other vehicle-generated data related to an individual person’s driving style.

The Personal Data processed is limited to the data necessary for carrying out the business purpose for which such Personal Data is collected. Effitrax will maintain Personal Data in a manner that ensures it is accurate, complete and up-to-date.

Effitrax will collect the Personal Data as a general rule directly from the Data Subject. However, in line with legal provisions, data may also be collected from third parties. In particular, this applies to data regarding an end-use customer’s vehicle in the event that automotive manufacturers return to Effitrax products that have been sold to them to be incorporated in their vehicles.

4. Purposes of data processing and legal bases

Effitrax processes Personal Data in accordance with applicable data protection laws and regulations and only for limited, explicit and legitimate purposes. Effitrax will not use Personal Data for any purpose that is incompatible with the original purpose for which it was collected as provided for in the contract unless you provide your prior explicit consent for further use.

Personal Data relating to customers and business partners may be processed for the purposes of:

- > Development and management of customer/business partner relationship
- > Internal administration purposes (including maintenance of accurate accounts payable and receivable records)
- > Customer support service
- > Corporate housekeeping
- > Contract management

- > Product, warranty and claims administration
- > Order processing and order fulfilment
- > Demand planning and production
- > Dispute management and litigation
- > Training and certification
- > Sourcing and procurement
- > Business development
- > Compliance with labor, tax and social security laws and other legal or regulatory requirements (e.g. meeting governmental reporting and records requirements)
- > Research, development and improvement of Effitrax products and services (including sales and market research (e. g. through surveys))
- > IT support
- > Public relations
- > (Direct) marketing
- > Facilities, security and contingency planning purposes
- > Network and device usage optimization and related security controls (including access to the Effitrax platform)
- > Preventing, detecting and investigating fraud
- > To monitor and enforce compliance with Effitrax policies and procedures
- > To monitor and enforce compliance with legal requirements applicable to Effitrax or contractual obligations (including the requirements set out in your contract with Effitrax)
- > Events
- > To perform internal and external audits
- > To conduct corporate transactions (including mergers, acquisitions and divestments)
- > Managing product research and development (“R&D”)
- > Product support and maintenance, failure diagnostic and identification of fault patterns.

The Personal Data is being collected and processed on the following legal basis:

- > if it is necessary for performing a contract you have concluded with Effitrax (e.g. if you sell a product to Effitrax, Effitrax needs your bank account number in order to pay for the product);
- > if it is necessary for complying with a legal obligation that applies to Effitrax (e.g. Effitrax may need to collect your VAT number to meet its tax obligations);

- › if it is necessary for pursuing Effitrax's legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms (e.g. if Effitrax needs certain of your Personal Data for internal administrative purposes, for ensuring network and information security and to improve its products and services);
- › when you consented to this (e.g. when you consented to receiving a Effitrax newsletter).

5. Data Security

Effitrax has implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

The measures include:

- › encryption of personal data where applicable/appropriate;
- › the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- › the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- › a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

6. Recipients of Personal Data

Effitrax may share your Personal Data with:

- › Suppliers of IT and collaboration related services;
- › Banks and insurers;
- › Providers of sales related services;
- › Providers of marketing, research and communications related services;
- › Providers of training related services;
- › Professional advisors;
- › Law enforcement authorities (including police and judicial authorities);
- › Other public authorities (including social security and tax authorities).

Effitrax will also disclose your Personal Data to third parties:

- › in the event that Effitrax sells or buys any business or assets, in which case Effitrax may disclose your Personal Data to the prospective seller or buyer of such business or assets;
- › if Effitrax or substantially all of its assets are acquired by a third party, in which

case the Personal Data Effitrax holds about you may be one of the transferred assets;

- › if Effitrax is under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to protect the rights, property or safety of Effitrax, its customers or others. This includes exchanging Personal Data with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident; and
- › if you specifically consented thereto.

When disclosing your Personal Data to third parties that will process your Personal Data on Effitrax's behalf, your Personal Data will only be disclosed to carefully selected data processors acting on the basis of Effitrax's instructions to comply with the applicable legal and contractual obligations.

7. Retention of Personal Data

Effitrax will not retain your Personal Data for longer than is allowed under the applicable data protection laws and regulations or for longer than is justified for the purposes for which it was originally collected. As a general rule, collected data will be deleted as soon as there no longer exists a business relationship with the customer/business partner or in the event of communication inactivity for the duration of a period of 2 years. However, collected data may be subject to retention requirements pursuant to applicable legal provisions. In other cases, Personal Data may be stored and retained for as long as the statutory period of limitations with regards to legal claims against Effitrax has not expired.

8. Data protection rights

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data Effitrax holds about you:

- › you have the right to access the Personal Data Effitrax keeps about you – this is because Effitrax wants you to be aware of the Personal Data Effitrax has about you and to enable you to verify whether Effitrax processes your Personal Data in accordance with the applicable data protection laws and regulations;
- › you have the right, under certain circumstances, to block or suppress further use of your Personal Data. When the processing is restricted, Effitrax can still store your Personal Data, but can no longer use it;

- › if your Personal Data is inaccurate or incomplete, you have the right to request the rectification of your Personal Data;
- › you have the right, under certain circumstances, to request the deletion or removal of your Personal Data from Effitrax systems;
- › if Effitrax's processing of your Personal Data is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to Effitrax's use of your Personal Data for direct marketing purposes;
- › you have the right to obtain from Effitrax, under certain circumstances, your Personal Data in a structured, commonly used and machine-readable form so you can reuse it for your own purposes across different services;
- › you also have the right to object to certain types of processing, including processing for direct marketing purposes.

However, note that Effitrax may need to retain certain Personal Data, for example for legal or administrative purposes (e.g. keeping of accounting records).

You can exercise these rights at any time by contacting the Effitrax DPO (see Section III. above). For all requests set out above, please send us an e-mail or letter with "GDPR Request" in the subject line.

You also have the right to lodge a complaint about the way Effitrax handles or processes your Personal Data with the "Gegevensbeschermingsautoriteit", the Belgian national data protection authority.

9. Policy Compliance and Contact Information

Monitoring and ensuring compliance of the Personal Data processing within Effitrax with this Policy and applicable data protection laws and regulations is the responsibility of the DPO.

You may contact the DPO with regard to any issue related to processing of your Personal Data and to exercise your rights as mentioned above.

10. Miscellaneous

This Policy will be effective as of 1 September 2021 and will be applicable to Effitrax (see Section I. above for a precise definition of the scope).

This Policy may be revised and amended from time to time and appropriate notice about any amendments will be provided.

Effitrax is allowed to adapt the text of this Policy only in order to be compliant with local legislation by means of an addendum attached to this Policy. In case of any discrepancies between this Policy and a specific local addendum made in accordance with local law, the terms of the latter will prevail.