

## PRIVACY POLICY

### 1. OUR PRIVACY STATEMENT

- 1.1 This policy, together with our Privacy Consent Form, sets out how Mitsubishi Motors Corporation with registered office at 1-21, Shibaura 3-chome, Minato-ku, Tokyo Japan ("**MMC**") and its subsidiaries, related bodies corporate and franchisees worldwide (collectively referred to in this policy as "**MMC**", "**we**" or "**us**") protects the privacy of your Personal Data (as defined below) and the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us ("**Privacy Policy**"). For the purpose of this Privacy Policy, MMC has appointed MMC Customer Response Center. (Available Weekdays 9:00-17:00 JST, Saturday and Sunday 9:00-12:00,13:00~17:00 JST) as its representative.
- 1.2 For the purposes of this Privacy Policy, Personal Data means personal data or personal information as defined by the Applicable Laws (as defined below).
- 1.3 MMC is committed to ensuring that your privacy is protected and to ensuring that your Personal Data is processed in accordance with applicable laws and regulations (as amended or replaced from time to time) protecting the privacy of personal data in the jurisdictions in which we operate and target ("**Applicable Laws**"). MMC will only collect, use, store, disclose and transfer your Personal Data in accordance with this Privacy Policy and the Privacy Consent Form.
- 1.4 Please read the following carefully to understand MMC's views and practices regarding your Personal Data and how we will process it. By using the Smartphone Link Gateway ("**Application**") you confirm that you have read, understood and agree with the processing, including the collection, use, storage, disclosure and transfer of your Personal Data in accordance with this Privacy Policy and according to the consents you give in the Privacy Consent Form. If you do not agree or withdraw your consent, you should not use the Application and will not be able to access all features and functionality of the Application.
- 1.5 If you are under the age of 16, you must not use the Application or submit Personal Data unless you have the consent of and are supervised by a parent or guardian. MMC does not knowingly collect information from people under the age of 16.
- 1.6 This Privacy Policy was last updated on, and is effective as of, 18,June 2019. MMC reserves the right, in its sole discretion, to modify, revise, delete and update this Privacy Policy from time to time. MMC will use reasonable endeavours to notify you in advance and in an appropriate manner of any modifications to the terms of this Privacy Policy (e.g. by emailing to you the revised policy with a new effective date and by publishing the information about such modification on its web page <http://mitsubishi-connect.com/privacy/SPLGateway/> ). Unless we need to obtain your consent to the changes, the amendments shall be deemed to have been accepted by you unless an objection is raised within one month of notification. If you do not agree with the modifications, revisions, deletions or updates, your exclusive remedy is to de-install and cease using the Application.

### 2. THE PERSONAL DATA THAT WE COLLECT FROM YOU

- 2.1 When you use the Application we may collect the following Personal Data about you:
- (a) **Information you give us:** You may give us information about you by downloading the Application, directly entering information into the Application through using voice commands or a touch panel or by corresponding with us by phone, email or otherwise.

This includes information you provide when you report a problem with the Application. Such information may include, but is not limited to:

- (i) your name, title, gender and/or date of birth;
  - (ii) your vehicle information such as license plate number and information from vehicle sensors.; and
  - (iii) your contact information including phone/mobile number and email address.
- (b) **Information MMC collects about you:** With regard to your use of the Application we may automatically collect the following information:
- (i) Information about the **location** of your mobile device and your vehicle, including longitude/ latitude data, city and street location;
  - (ii) **Driving behavior information** (i.e. information about how you drive your vehicle)
  - (iii) demographic information including your home or other addresses and postcode;
  - (iv) technical information, including the Internet protocol (IP) address used to connect your mobile device to the Internet, your login information, operational data, operating platform type and version, and time zone setting;
  - (v) information about your use of the Application, including date and time of use; page response times, and download errors.
- (c) **Information MMC receives from third parties:** MMC may receive information about you collected by third parties such as user account name.

### 3. **WHAT WE DO WITH YOUR INFORMATION**

3.1 MMC (and third party data processors who may be acting on our behalf) may collect, store and process your Personal Data described above for the following purposes:

- (a) to administer and operate the Application, its functionalities and the services provided in connection with the Application;
- (b) to provide information related to the Application's performance including problems such as bugs or connectivity issues and to provide updates to the Application including any fixes;
- (c) for our internal record keeping requirements including collection of anonymised details about use of the Application to compile aggregate statistics or produce internal reports;
- (d) to make improvements to the Application and to ensure that content from the Application is presented in the most effective manner for you and your mobile device;
- (e) subject to your consent (if applicable) to share your Personal Data with selected third parties in accordance with Section 4 of this Privacy Policy;
- (f) to the extent we have a legal obligation, right or duty under the Applicable Law to use or disclose your information (including for crime and fraud prevention and related purposes).

3.2 In addition to the purposes listed above, subject to your consent, MMC collects and processes geolocation information for Operating the Application and providing and improving the services in connection with the Application.

3.3 MMC will delete your Personal Data after the following criteria have been met [**Complete to send requested data to requesting applications/Disconnect the USB connection**]. Notwithstanding, MMC will only retain your Personal Data for as long as reasonably necessary having regard to the purposes for which your Personal Data was collected and will delete such Personal Data after the expiry of such period unless otherwise required under the Applicable Law.

#### 4. **DISCLOSURE OF YOUR PERSONAL DATA**

4.1 MMC may share your Personal Data that it collects from you or that you provide to MMC with selected third parties for the following purposes:

- (a) to operate the Application and provide the services in connection with the Application or any other purposes as set out in section 3.1 above;
- (b) to enforce or apply the Application's end user licence agreement and other agreements or to investigate potential breaches of such agreements;
- (c) Firebase

The application uses Firebase that is an analysis service provided by Google Inc. with registered office at 1600 Amphitheatre Parkway Mountain View, CA94043, US ("Google")

The information used here is subjected to analysis statistical processing and processed so that individuals can not be identified.

Firebase services that the application uses is below.

Google Analytics for Firebase
Cloud Storage for Firebase
Firebase Authentication
Crashlytics

If you do not wish to use these services, opt-out the Firebase features you do not wish to use through the application setting.

Please view the privacy notices of these third parties to understand how they will use your Personal Data.

<https://firebase.google.com/terms/>

<https://www.google.com/policies/privacy/partners/>

<https://policies.google.com/privacy?hl>

4.2 Personal Data that may be shared with third parties may include:

- (a) technical information, including the Internet Protocol (IP) address used to connect your mobile device to the Internet, your login information, operational data, operating platform type and version, and time zone setting;

- (b) information about the location of your mobile device and your vehicle, including longitude/latitude data, city and street location; and
  - (c) information about your use of the Application, including date and time of use; page response times, and download errors.
- 4.3 For the purposes listed in Section 4.1 above, MMC may share your Personal Data with:
  - (a) business partners, suppliers and sub-contractors ;
  - (b) companies that provide statistical analysis services; and
  - (c) analytics and search engine providers such as Google Inc. that assist us in the improvement and optimisation of the Application.
- 4.4 MMC may share your Personal Data with selected third parties in the following ways:
  - (a) through the Application; or
  - (b) by mail, telephone, Fax, e-mail or other electronic messaging service
- 4.5 MMC will take reasonable steps to ensure that third parties who have received Personal Data from MMC will maintain a comparable level of protection of the Personal Data as set out in this Privacy Policy. To the fullest extent permitted by law, MMC excludes all liability arising from the use of your personal information by third parties. MMC shall, on request, confirm the name of each third party that Personal Data is, or will be, transferred to.
- 4.6 MCC may disclose Personal Data to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce the Application's terms of use or other agreements, or to protect MMC's rights, property or safety or the rights, property or safety of other users of the Application or others (e.g., for fraud protection etc.).
- 4.7 Except as set out in this Privacy Policy, we will not disclose, sell, distribute, rent or lease your Personal Data to third parties unless we have your permission or to complete a transaction for you. We do not share your Personal Data with third parties for their direct marketing use without your express consent.
- 4.8 In the event that a third party proposes to acquire all or some of our business and/or assets, we may disclose your Personal Data to that third party in connection with their proposed or actual acquisition. In the event that we become insolvent or we are in any similar situation, we may also disclose your Personal Data to third parties as part of a business or asset sale carried out where such disclosure is lawful and compliant with the Applicable Laws.

## 5. **INTERNATIONAL TRANSFERS OF DATA**

- 5.1 MMC operates a global business and may transfer the Personal Data collected from you to our overseas related entities, subsidiaries, related bodies corporate and franchisees in order to provide the Application for the purposes described in Sections 4.1-4.3. It may also be necessary for us to disclose your Personal Data to third parties located overseas in connection with the purposes set out in this Privacy Policy. The countries to where we may transfer your Personal Data include, US, Japan
- 5.2 Please be aware that those overseas countries may not offer the same level of data protection as the country in which you initially provided the information, although our collection, storage, disclosure and use of your Personal Data will continue to be governed by this Privacy Policy. By providing your consent in the Privacy Consent Form you consent to the transfer, storage and/or processing of your Personal Data outside the country in which the information was originally collected in accordance with this paragraph. We will

take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy, and where we have engaged third parties to perform services in relation to the Application, MMC will use contractual or other means to ensure such third parties offer a comparable level of protection in respect of the Personal Data.

## 6. **SECURITY**

MMC has in place security measures to store all Personal Data collected and received securely. We use appropriate technical, organisational, administrative and physical measures to protect your Personal Data contained in our system against accidental damage, deletion, misuse, loss and unauthorised access or alteration. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through the Application and any transmission is at your own risk. Once MMC has received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access.

## 7. **YOUR RIGHTS**

- 7.1 In addition to, and without limitation of, any rights you have under Applicable Laws, you have the rights set out in this section 7.
- 7.2 You have the right to, at any time, ask us not to process or share your Personal Data for marketing purposes (even where you have previously given consent). If you do so, MMC will stop processing your Personal Data for marketing purposes. MMC will inform you (before collecting your data) if it intends to use your Personal Data for such purposes or if MMC intends to disclose your Personal Data to any third party for such purposes (subject to obtaining your prior consent).
- 7.3 You have the right to access details of your Personal Data that we hold about you by request (preferably in writing) and to request rectification, blocking or erasure of such Personal Data, and to determine the outcome of your personal data after your death if the Applicable Laws allows you to do so.
- 7.4 You may choose to no longer receive communications from us by replying STOP to communications (if any) you receive through the Application. This may result in certain features of the Application ceasing to function. You may unsubscribe from any email or communication from us using the instructions in the email or communication you receive; this will not stop us from sending emails about your account or transactions with us or other information required to operate the Application.
- 7.5 You may choose whether to provide geolocation information to us through the Application by adjusting the settings on your mobile device.
- 7.6 You may also choose whether to share your Personal Data with selected third parties by adjusting the settings within the Application.
- 7.7 You may choose to delete or block cookies by adjusting the settings on your mobile device. This may result in certain features of the Application ceasing to function.
- 7.8 You also have the right to change your mind about the consents given in the Privacy Consent Form to the use, disclosure and transfer of your Personal Data in accordance with this Privacy Policy, and object to further processing, by contacting us using the contact details listed below. If you withdraw your consent for MMC to process your Personal Data in accordance with this Privacy Policy, you will no longer be able to use the Application.
- 7.9 You have the right to make a complaint about a possible breach of the Applicable Laws to us. We will consider any complaints we receive and respond to your complaint within a reasonable period of time. You also may lodge a complaint about the processing of your

Personal Data with the supervisory authority located in your jurisdiction, if the Applicable Laws allows you to do so.

- 7.10 You can exercise your rights above by contacting us using the contact details listed below. In some jurisdictions you will need to provide a copy of your government identification in order for us to verify your identity.

8. **NOTICE TO CALIFORNIA RESIDENTS: YOUR CALIFORNIA PRIVACY RIGHTS**

- 8.1 We do not share your Personal Data with third parties for their direct marketing use without your express consent.

9. **CONTACT**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to <https://inquiry.mitsubishi-motors.co.jp/contact/agree.do>.