



PRIVACY POLICY

Crossyn Automotive B.V.



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Crossyn Automotive B.V. (hereafter: 'Crossyn', 'we', 'us', 'ours') runs a data platform and provides CrossServices, based on vehicle data from Connected Cars.

Crossyn supplies the devices that need to be installed in the Connected Car. After the installation, data can be transferred from the device to Crossyn's data platform. Using these data, tailor-made CrossServices can be provided.

The collected vehicle data can be considered to be personal data, which is the case when the data is related to a natural person or can be identified. For this reason, the privacy and security of your personal data is very important to us. We want to assure you that your information will be properly managed and protected whilst in our hands. Moreover, you're always in full control!

1. GENERAL PROVISIONS

1. This Privacy Policy is designed to explain you how we collect and use the data that are generated by your Connected Car.
2. Crossyn acts in accordance with European legislation and regulation.
3. We collect and process data, including personal data, that you provide to us via the Drivers Portal (such as name and address data and the registration number of your car) and data that are transferred from the device in the Connected Car to our data platform. This can include, for instance, the battery level, location, speed and braking process. Certain data, such as location data, can (possibly with technical means) be traced back to the Driver. These data will, of course, also be classified as personal data. Machine data encompasses data that can't be traced back to an individual.
4. We take your privacy very seriously and implement appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access.
5. During the registration process at the Drivers Portal, you decide whether and to what extent you give consent to allow us to collect, process and share your personal data.
6. The following provisions describe the way in which Crossyn deals with your personal data, after you have signed-up for the Drivers Portal. Of course, your decision whether or not to give consent for collecting, processing and sharing personal data can always be changed by adjusting your privacy settings at the Drivers Portal.

2. DATA TRANSFER THROUGH THE DEVICE IN THE CONNECTED CAR

1. The data transferred through the device in the Connected Car to our data platform may include:
 - a) information from the on board computer, such as on board diagnoses, trouble codes, malfunctions and emission data;
 - b) location data, battery level;
 - c) information concerning the usage of the vehicle, such as measurements of speed, braking and operational time (between start and stop engine).

3. COLLECTING AND PROCESSING PERSONAL DATA

1. We collect and process the following personal data, if and in so far as you provided these data to us via the Drivers Portal:
 - a) name, address, mail address, phone number, date of birth, gender;
 - b) registration number of the Connected Car;
 - c) Number of your passport or identity card.
2. We collect and process personal data that are collected by the device in the Connected Car, if you have given consent to allow us to do so via the Drivers Portal.
3. Furthermore, we collect and process the following data:
 - a) responses to inventory lists from Crosssyn;
 - b) information required to rectify a problem with CrossServices, the Drivers Portal or the websites from Crosssyn;
 - c) a report of all correspondence between the Driver and Crosssyn;
 - d) a report of actions and visiting moments on the app, Drivers Portal or website, through using cookies or similar technologies allowing for the identification of your browser or apparatus;
 - e) automatically collected and saved log files sent to us by your browser when visiting our website, such as IP-addresses and queries;
 - f) machine data that can't be traced back to an individual and that, therefore, may lawfully be collected without its consent;
 - g) anonymized data for analysis purposes, such as the average travelling time.
4. The personal data collected by Crosssyn and referred to in 4.1, 4.2 and 4.3, will be, as necessary, processed to:
 - a) complete your registration process. As a result of the registration, the Connected Car can be linked to your Driver profile;
 - b) provide access to certain CrossServices;

- c) give effect to the agreement that has been concluded between Crosssyn and the Driver;
- d) give effect to an agreement that has been concluded between Crosssyn and a Service Provider. Personal data won't be shared with Service Providers, unless you have given your express prior consent;
- e) optimize CrossServices through data science;
- f) provide insight into both the conditions of the Connected Car and the driving behavior. This information can aid to safer driving and to save fuel;
- g) help you find your parking lot and show you the actual fuel prices in your area;
- h) be able to contact you to provide better service or to inform you about important changes and/or new CrossServices;
- i) maintain, secure, improve and develop (new) CrossServices, the Drivers Portal and the website;
- j) be able to comply with legal obligations;
- k) properly perform administrative tasks.

4. SHARING PERSONAL DATA

1. Personal data will not be shared with third parties, unless you, as a driver, have given your explicit prior consent. Without your consent for the processing of personal data as meant under 4, only non-identifiable data are used.
2. Crosssyn shares the personal data referred to in 4.1, 4.2, and 4.3 with the Service Provider from which you buy Services, if you have given your explicit prior consent to allow the Service Provider to offer and/or improve Services by means of these data. These Services can, for example, aim to provide information, provide assistance and/or stimulate the driving behavior.
3. For the use of personal data by the Service Provider for the execution of a specific Service, the approval of the Driver is required.
4. If and in so far as prior and unambiguous consent is given by the Driver, beforementioned personal data can be shared with several Service Providers and/or third parties.
5. In case you receive CrossServices from Crosssyn, and you owe an amount, your payment details are processed by the payment processor of Crosssyn.
6. In addition to the foregoing, Crosssyn reserves the right to share personal data without the consent of the Driver, if:
 - a) Crosssyn considers that, based on a legal obligation, the personal data must be provided to a competent authority, Crosssyn considers that sharing the data is necessary to protect the vital interests of those to whom the data refer, or if sharing is necessary for establishing, exercising, or defending against legal claims;

- b) an external contractor or a party related to Crosssyn, performs a task on behalf of Crosssyn, with guarantee of privacy legislation through an underlying data processing agreement;
- c) a purchase, merger, reorganization, termination, or similar event where personal data are part of transmittable data takes place. In case of such a situation, Crosssyn shall inform the Driver in time and offer the opportunity to change his privacy preferences.

5. STORAGE AND SECURITY OF DATA AND PERSONAL DATA

1. Personal data are no longer collected and saved as permitted and/or necessary for the purpose for which the personal data are collected.
2. The data are collected and processed using devices and processes that are suitable to guarantee the security and confidentiality.
3. All data are stored on our data platform. We take the protection of your data and the security of our data platform very seriously, and we implement appropriate technical and organizational measures to protect the personal data against loss or any form of unlawful processing. We operate in accordance with the standards of ISO 27001 and use Thales' advanced encryption software. The vehicle data are sent from the vehicle via a private network. We apply strict safety standards in order to prevent unauthorized access to our network.
4. If passwords, usernames or other possibilities of access are used for accessing CrossServices, the Drivers Portal and/or website of Crosssyn, the Driver is responsible to save them and prevent them from abuse or theft.

6. ACCESS TO, AND IMPROVEMENT OF PERSONAL DATA

1. You have the right to access and to correct, rectify, erasure or blocking of your personal data. If desired, you can contact Crosssyn at any time to exercise these rights. We will take all reasonable steps to confirm your identity before providing you with details of any personal data we may hold about you. You can make changes concerning privacy preferences via the Drivers Portal.

7. OTHER PROVISIONS

1. Crossyn is not responsible for data (platforms) that are not managed by Crossyn. The same applies if we refer to these data (platforms) through for example links to other websites.
2. The personal data collected by Crossyn is not stored in nor transmitted to countries outside the European Union.
3. We may amend this Privacy Policy from time to time, for example to keep it up to date or to comply with legal requirements. The latest version of the Privacy Policy can always be found on our website.

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