



## PRIVACY POLICY

Bridgestone Corporation and its subsidiaries (collectively herein called "Bridgestone Group") have developed this application ("the App") enabling Bandag franchisees to follow and manage the tyre casings processed through each stage of the Bandag retreading process, and for tyre dealers, truck and bus fleet customers and tyre casing collectors (collectively herein called "Operators") to receive full visibility with actionable reporting on parameters such as casing acceptance rates, average numbers of repairs needed and number of life cycles of their casings, enabling the end-users to make better decisions on the use of their casing assets (the "Functionalities").

The Operators can register their directors and employees as users of the App (individually a "User" or collectively "Users"), and complete User accounts.

This Privacy Policy describes how the User's Personal Data (defined below) are collected, used and shared through the App.

In this Privacy Policy, Bridgestone shall mean:

- a) **Bridgestone Europe NV/SA**, for a User working in Europe or United Arab Emirates.
- b) **Bridgestone Americas Tire Operations, LLC**, for a User working in North America, Central America or South America.

In order to receive the Functionalities provided by the App, the Operators, as individual data Controllers (defined in European data protection laws) of the Personal Data of their Users, share with Bridgestone, such Personal Data to enable User accessibility. Each individually, Operators and Bridgestone, are Controllers in common in relation to the Users' Personal Data.

The processing of Personal Data by Bridgestone shall take place:

- a) within the framework of the Terms and Conditions of Use, and
- b) as described in this Privacy Policy.

### 1. How and why do we collect Personal Data?

#### **a) Personal Data that Bridgestone processes as a Controller in common to enable access to the App**

The Operators have given their Users access to the App on the basis of the Users' professional relationship with the Operators on whose behalf they are using the App in the performance of their contractual duties. The Operators are processing certain Personal Data of their Users on the basis of their legitimate interest of using the App for purposes of better managing their casing assets in order to reduce overall operating cost, and share the Users' Personal Data with Bridgestone. Bridgestone is processing the Users' Personal Data on the basis of its legitimate interest to provide tyre management solutions to the employer of the Users.

- The User is required to provide the following Personal Data: **first name, surname, mobile telephone number, language used, professional e-mail address, the User's role at the Operator, password, and PIN code**. The purpose of providing the requested Personal Data is for the Users to create or reconfigure their account, receive access to the use of the App, and communicate with Bridgestone for receiving troubleshooting and technical support for the use of the App.
- The App provides the User with the option to upload a picture. As this functionality has no specific purpose for the operation of the App, Users are advised not to upload pictures containing Personal Data. Data Processor (defined in European data protection laws) shall be authorized to remove and delete pictures containing Personal Data.

Bridgestone shall not use these Personal Data for other purposes than herein described, subject to Section 1.b) of this Privacy Policy.

### **b) Personal Data that Bridgestone processes on its own behalf and shares with the Operator**

The App automatically generates reports to Operators, which contain analyses of the Operator's efficiency, quality, productivity and applied safety measure. Such analysis includes Personal Data of Users, which Bridgestone processes on the basis of its legitimate interest to safeguard and improve the quality and service levels of the retreading services that Bridgestone brings to market via its network of Bandag dealers and casing collectors. The reports contain the following Personal Data:

#### Reports to casing collectors:

- Number of casing collection points visited by the collector on a time scale
- Number of casings collected by the collector on a time scale

#### Reports to retread manufacturing facility

- For each phase in the retreading process, the name of the work station operator, the time of his starting and finishing the production phase, and a failure rate analysis showing the number of product rejects and reworks.

#### Reports to the Fleet Customer

[To be discussed]

### **c) Personal Data that Bridgestone processes on its own behalf as a Controller for its own purposes**

- i) Bridgestone may request, on its own behalf and on behalf of its subsidiaries, the User's explicit consent for the following processing:
  - Bridgestone operates a technical help desk which includes the option to provide Users with remote assistance by taking control of the terminal of the User. The remote assistance option is enabled or disabled by the User, who is free to give or refuse his

consent to the processing of his/her Personal Data resulting from the remote assistance.

- The User's first name, surname and professional e-mail address, for the purpose of providing information, products, services and promotions of Bridgestone or third parties, that may be of interest to the User. The User will have the right to withdraw his consent at any time by using the opt-out option ('unsubscribe link ') contained in every marketing mailing, or by contacting Bridgestone in accordance with Section 8 below. The User's refusal to give consent to Bridgestone for the processing of his Personal Data for Bridgestone's own purposes, shall not affect the processing of Personal Data for the purpose of provided access to the App as set forth in section 1.b) of this Privacy Policy.
- ii) As the User navigates within the App, in order to secure its own legitimate interest, Bridgestone also may automatically track, collect and store the IP-address of the User's hardware when connected to the internet, make and type of the User's hardware device, the domain name from which you access the internet, the operating system and browser the device uses, the date and time when logging on the App, or other data that the User allows the App to access on the device through permissions granted by the User on his device. Bridgestone processes these data for the purpose of securing its infrastructure, providing, maintaining, improving the functionalities of the App, including providing additional features and content, responding to the User's questions and requests, sending the User technical notices, updates, security alerts and support, and administrative messages, monitoring and analyzing trends, usage and activities in connection with the App, detecting, investigating and/or preventing fraudulent, unauthorized or illegal activity.
- iii) This App uses cookies – small text files that are placed on the device of the User to help the App provide a better user experience. In general, cookies are used to retain user preferences and store certain information for future log-ins, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this App. The most effective way to do this is to disable cookies in your browser. Please check Bridgestone's [Cookies Policy](#) for more guidance.

### **3. What do we do with the Personal Data?**

All of User's Personal Data Bridgestone processes are stored within a secured infrastructure under Bridgestone's management, with support of external suppliers as described in section 5 of this Policy.

Bridgestone shall not process Personal Data that are not relevant for the purposes as set out above, or otherwise notified to the User when Bridgestone seeks consent for the processing of his Personal Data, and shall not retain the data longer than necessary for those purposes or, as the case may be, for the period as determined in an agreement or by law.

This means that Bridgestone processes Personal Data of a User:

- until the Operator on whose behalf the User is using the App has discontinued the use of the App or Bridgestone has revoked the Operator's rights to use the App;
- until the User's account has been inactivated by his Operator;
- for the purposes that require the User's consent, until the User withdraws his consent, and Bridgestone has no legitimate interest for further processing the User's Personal Data;
- In case Bridgestone processes the User's Personal Data in order to secure its legitimate interest, until the expiration of the legitimate interest.

In general, Bridgestone will delete the Users Personal Data if it is no longer necessary to achieve the purposes for which they were originally processed. However, Bridgestone may be required to store the Personal Data for a longer period due to requirements by law.

#### **4. The confidentiality and security of the User's Personal Data**

Bridgestone takes data security very seriously. Bridgestone applies an appropriate level of security and has therefore implemented reasonable physical, electronic, and administrative procedures to safeguard the collected information from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed. Bridgestone's information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements. Access to the User's Personal Data is granted only to those personnel, service providers or Bridgestone affiliates with a business need-to-know or who require it in order to perform their duties.

Among other things, Bridgestone optimizes the security of the Personal Data by:

- using encryption where appropriate;
- using password protection;
- requesting contractual guaranties from third party providers and sub-processors
- limiting the access to Personal Data according to the need-to-know principle (e.g., only employees who need the User's Personal Data for the purposes as described above shall receive permission to access them); and
- By taking all reasonable precautionary measures to ensure that employees who have access to the Personal Data will be knowledgeable about data protection requirements and will process the Personal Data exclusively in accordance with this Privacy Policy and Bridgestone's obligations under applicable privacy laws.

In the event of a data breach containing Personal Data within Bridgestone's organization, all applicable data breach notification requirements will be met.

#### **5. To whom do we disclose the Personal Data?**

Bridgestone will disclose Personal Data only for the purposes and to those third parties as described below. Bridgestone will take appropriate steps to ensure that Personal Data are processed, secured, and transferred according to applicable law.

### **a) Within Bridgestone Group**

Bridgestone is part of the Bridgestone Group, consisting of several companies in Europe and abroad. The Personal Data may be transferred to one or more Bridgestone Group affiliated companies located in or outside Europe as needed for data processing and storage, providing Users with access to our services, providing customer support, making decisions about service improvements, content development and for other Purposes as described in this Policy.

The above will be strictly connected with:

- any kind of service that is rendered by one Bridgestone Group company to another (under relevant processing agreement) or
- the fact that more than one Bridgestone Group entity decides on how the User's Personal Data are used (under relevant joint controllership agreement) or
- The fact that another Bridgestone Group entity becomes a separate Controller of the User's Personal Data for a given purpose (e.g. subject to the User's explicit consent).

### **b) External service providers**

Where necessary, Bridgestone Group will commission other companies and individuals to perform certain tasks contributing to services on Bridgestone Group's behalf within the framework of data processing agreements. Bridgestone Group may, for example, provide the User's Personal Data to agents, contractors or partners for data storage services or to send the User information that he requested. This information shall not be used by them for any other purposes than herein described, in particular not for their own or third party purposes. Bridgestone Group's external service providers are contractually bound to respect the confidentiality of the Users' Personal Data.

### **c) Business transfers**

In connection with any reorganization, restructuring, merger or sale, or other transfer of Bridgestone Group's business assets (collectively "Business Transfer"), Bridgestone Group will transfer information, including personal information, in a reasonable scale and as necessary for the Business Transfer, and provided that the receiving party agrees to respect the User's Personal Data in a manner that is consistent with applicable data protection laws. Bridgestone Group will continue to ensure the confidentiality of any Personal Data and give affected Users notice before Personal Data become subject to a different privacy policy.

### **d) Public bodies**

Bridgestone Group will only disclose User's Personal Data to public bodies where this is required by law. Bridgestone Group will for example respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside the User's country of residence.

### **e) On other legal grounds**

Further, Bridgestone Group may disclose the User's Personal Data in order to protect its legitimate interests or if it is required or permitted by law or if the user gives explicit consent for such transfer of the User's Personal Data.

#### **f) International transfers of Personal Data**

Under specific circumstances, it will also be necessary for Bridgestone Group to transfer the User's Personal Data to countries outside the European Union/European Economic Area (EEA) ("Third Countries"). Transfers to Third Countries may refer to all processing activities described in this Privacy Policy. This Privacy Policy shall apply also if Bridgestone Group transfers Personal Data to third countries, in which a different level of data protection applies than in the User's country of residence.

Any transfers of Personal Data into countries other than those for whom an adequacy decision regarding the level of data protection was made by the European Commission, as listed on [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), occur on the basis of contractual agreements using standard contractual clauses adopted by the European Commission, and providing for the appropriate safeguards in accordance with the applicable law. If you wish to verify the appropriate safeguards, you can request a copy via <https://privacy.bridgestone.eu/?language=EN>;

## **6. User rights with regard to Personal Data**

Users have specific legal rights relating to their Personal Data collected. This applies to all processing activities stipulated in this Privacy Policy. Bridgestone Group will respect the User's fundamental rights and will deal with the User's concerns adequately.

The following list contains information on the User's legal rights which arise from applicable data protection laws:

- **Right to rectification:** Users may obtain rectification of their Personal Data. Bridgestone Group makes reasonable efforts to keep Personal Data in its possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us.
- **Right to restriction:** Users may obtain restriction of processing of their Personal Data, if
  - the User contests the accuracy of his Personal Data for the period needed to verify the accuracy;
  - the processing is unlawful and the User requests the restriction of processing rather than erasure of his Personal Data;
  - the User's Personal Data are no longer needed but the User requires them for the establishment, exercise or defense of legal claims, or if
  - The User objects to the processing while verifying whether the data Controller's legitimate grounds override his.

- **Right to access:** the User may ask information regarding his Personal Data that are processed, including information as to which categories of Personal Data that are processed, what they are being used for, where they are collected from if not from User directly, and to whom they have been disclosed, if applicable.
- **Right to erasure:** The User may obtain erasure of his Personal Data, where
  - the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - The User has a right to object further processing of his Personal Data (see below);
  - the Personal Data have been unlawfully processed; unless the processing is necessary;
  - for compliance with a legal obligation which requires processing;
  - in particular for statutory data retention requirements;
  - For the establishment, exercise or defense of legal claims.
- **Right to object:** the User may object – at any time – to the processing of his Personal Data due to his particular situation, provided that the processing is not based on his consent but on our legitimate interests or those of a third party. In this event Personal Data shall no longer be processed, unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for the establishment, exercise or defense of legal claims. If the User objects to the processing, he should specify whether he wishes the erasure of his Personal Data or the restriction of its processing.
- Users may lodge a complaint with the data protection supervisory authority in the country they live in or where the alleged infringement occurred.

User's request will be handled within 30 days. However, the period may be extended due to specific reasons relating to the specific legal right or the complexity of his request. In certain situations it may not be possible to give User access to all or some of the Personal Data due to statutory provisions. If the User's request for access is denied, he will be advised of the reason for the refusal. In some cases, it may not be possible to clearly identify the User on the basis of his Personal Data due to the identifiers which he provides in his request. In such cases, where a User cannot be identified as a data subject, it may not be possible to comply with the User's request to execute his legal rights as described in this section, unless the User provides additional information enabling his identification.

In order to exercise his legal rights in relation to the processing of Personal Data by Customer pursuant to Section 1.a) of this Privacy Policy, Users must notify the data protection responsible person at the Operator who is employing the User.

In order to exercise his legal rights in relation to the processing of Personal Data by Bridgestone on its own behalf pursuant to Section 1.b) of this Privacy Policy, Users must notify Bridgestone by completing the online form on the following websites:

- a) <https://privacy.bridgestone.eu> for a User in Europe or United Arab Emirates.
- b) [https://\\*\\*\\*\\*\\*\\*\(TBD\)](https://******(TBD)) for a User in North America, Central America or South America

If the User believes that the processing of his Personal Data infringes his statutory rights, he has the right to lodge a complaint with a data protection supervisory authority, in particular in the Member State of his habitual residence, place of work or place of the alleged infringement.

## **7. Changes to this Policy**

Bridgestone Group reserves the right, at its discretion, to modify its privacy practices and update and make changes to this Policy at any time. For this reason, Bridgestone Group encourage the user to refer to this Privacy Policy on an ongoing basis. This Privacy Policy is current as of the "last revised" date which appears at the top of this page. We will treat Personal Data in a manner consistent with the Privacy Policy under which they were collected, unless we have your consent to treat them differently.

Bridgestone Group will also keep prior versions of this Privacy Policy in an archive for your review.

## **8. Contact Information**

Please direct questions regarding Bridgestone's processing of Personal Data to Bridgestone's Data Protection Manager via the following websites:

- a) <https://privacy.bridgestone.eu>. for a User in Europe or United Arab Emirates.
- b) [\(TBD\)](https://*****) for a User in North America, Central America or South America

Please read this Privacy Policy in conjunction with the Terms and Conditions of Use of this App, and any other policy developed by us from time to time and notified on the App.