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HONDA MOTOR EUROPE LOGISTICS NV

PRIVACY POLICY REGARDING ONLINE CONTENT FOR HONDA CUSTOMERS, DISTRIBUTORS, PARTNERS AND SUPPLIERS

Honda makes every effort to protect and respect your privacy. This Privacy Notice tells you how Honda Motor Europe Logistics NV, with its registered office at Langerbruggestraat 104, 9000 Gent, Belgium, with company number 0418.250.835, RLE Ghent, division Ghent ("**Honda**", "we" or "us") processes, collects, saves, keeps and administers your personal data, when you visit the websites and use the apps of Honda that refer to this privacy policy (together "Honda online content"), also when you download content, or when you contact Honda in relation to this website. It also describes your data protection rights, including a right to object to some of the processing that Honda carries out. More information about your rights, and how to exercise them, is set out in the "Your Choices and Rights" section.

We may also provide you with additional information when collecting personal data. We do so when, it is compulsory, or when in our opinion, it might help to provide relevant and timely information.

What Personal Data We Collect

We process the following types of personal data:

- Contact information: such as your name, telephone or mobile number, email address and other similar information.
- Technical data about your visit to Honda's online content: such as your IP address and operating system, browser type (for visits to our website), details about the device you are using (e.g., serial number of your device, unique identification number, MAC address, login details) and technical and event-based data related to your use of your device (e.g., internet and Bluetooth link and connection details and session duration).
- Any other information you provide us: such as signatures, photos, opinions, your location and any other information you communicate to us.
- Information about your Honda products (such as car, motorcycle, engine), such as VIN number, serial number, model code, ... when using a Honda app.
- Information you provide us through the whistleblower line or EPL line, such as your name, contact details, details of your professional activities, information relating to any alleged misconduct, subsequent investigations, and any outcome of such investigations, logs and/or recordings of telephone calls or meetings.

Why We Collect, Use and Store Personal Data

We collect, use and store your personal data for the purposes set out below.

- when required by Honda's legitimate interests below, if your data protection rights do not override our interests.
- to provide you with the Honda online content and related services;
- to manage resources for the Honda online content;
- to enable us to improve and optimize the Honda online content and our products and services;



- to respond to your request or inquiry, such as by sending a quote, locating the nearest Honda distributor or Honda engines service point or arranging an appointment with a Honda distributor;
- to notify Honda dealers and affiliates of upcoming servicing, test drives, recall campaigns or other appointments related to you or your vehicle;
- to contact you in connection with the latter two purposes (directly or through a Honda Group company, an authorized Honda distributor, relevant partner or agent) by email, text message or push message;
- to ask you to give your opinion or participate in surveys about our vehicles, products and services;
- to understand which parts of the Honda online content are popular and most frequently used, or which parts are in need of modification or improvement;
- to answer users' questions and complaints;
- for internal record keeping.
- when you have given your consent.
- to provide you with direct marketing material, such as information about products and services that may be of interest to you, by mail, telephone, e-mail and online. We always give you the opportunity to opt out of direct marketing.
- when necessary to comply with a legal obligation.
- when necessary to protect Honda's legitimate interests and legal rights, if your data protection rights do not override our interests and rights.
- to protect our legitimate business interests and legal rights. This includes, but is not limited to, uses in connection with compliance, regulatory objectives, audit, legal claims (including disclosure of such information in the context of legal proceedings or litigation) and other ethics and compliance reporting requirements.
- Honda will also convert personal information into anonymous data and can use it (usually based on aggregated statistical data) for research and analysis on improving Honda online content, analyzing trends and tailoring products. Aggregated personal information does not personally identify you or other users of the Honda online content.
- to send you information that we are legally obliged to send you in relation to recall campaigns and security incidents.
- to comply with the requirements of the Whistleblower legislations

On what legal basis do we collect, use and retain your personal data

We will only process your personal data:

- For the purposes stated in this privacy policy, and
- If we have a legal basis to do so.

The legal grounds we invoke are as follows:

- **Contract:** a contract with you that we are required to perform or to take steps prior to entering into a contract with you.
- **Consent:** your free consent where you are informed of what this consent means before you provide your consent.
- **Legitimate interest:** a legitimate interest that we pursue as a company, including to optimize our services.
- **Legal obligation:** a legal obligation that we must comply with.

Where do we process your personal data?

In principle, we process your personal data within the European Economic Area (EEA).



We may also transfer your personal data to third parties processing on our behalf outside the EEA. The following further defines how this processing is then done and the adequate safeguards we take to protect your personal data in such cases.

With whom do we share your personal data?

(a) Transfer/sharing of personal data within the Honda Group

We may transfer or share your personal data with other group companies of the Honda Group (for more information, see <http://world.honda.com/profile/overview/>).

(b) Transfer/sharing of personal data to official Honda dealers or repair shops

We may transfer or share your personal data with official Honda dealers and repair shops in the EEA. A full list of all Honda dealers can be found here below:

Cars: <http://www.fl.honda.be/cars/dealer-search.html>

Motorcycles: <http://www.fl.honda.be/motorcycles/dealer-search.html>

Marine: <http://www.fl.honda.be/marine/dealer-search.html>

Snowthrowers: <http://www.fl.honda.be/snowthrowers/dealer-search.html>

Industrial products: <http://www.fl.honda.be/industrial/dealer-search.html>

Garden and Lawn: <http://www.fl.honda.be/lawn-and-garden/find-a-dealer.html>

Engines: <https://www.honda-engines-eu.com/en/service-network>

(c) Transfer/sharing of personal data to companies providing services under contract

Your personal data will be shared with companies providing services under contract such as those companies set out below.

- IT hosting, IT development, Helpdesk providers
- IT maintenance company
- events and database of leads
- email campaigns and communication
- professional consultants and complaint management
- CRM provider and surveys
- Data Management and Data Analysis providers
- Retailers, Dealers and Distributors

Data transfers outside the EEA (European Economic Area).

In view of the above purposes, we may transfer your personal data to organizations outside the EEA. In doing so, we may use standard contractual data protection clauses (SCC) approved by the European Commission. We may also transfer your data to organizations in the US that participate in the EU-US Privacy Framework or that have business rules protecting your data approved by European data protection authorities. For more information, such as a copy of the documents we use to protect your information, please contact us. Our contact details can be found below under “Contact Us”.



Apps of third parties

When you download a third-party app from the Honda online content, your personal data will be transferred directly to the provider of that app as a separate data controller. Honda is not liable for the processing of your personal data by such app providers. Therefore, we encourage you to review and understand how your personal data will be used by app providers before downloading their apps.

(d) Transfer/sharing of personal data to other organisations

- Data transfer to third parties when we are required to disclose your personal data to comply with a legal obligation or when we believe it is necessary to protect the rights, property or safety of Honda, our customers or others.
- Data transfers to government agencies and/or law enforcement officials when required by law or when required to protect our legitimate interests in accordance with applicable laws.
- Data transfers to prospective or actual purchasers in the event that Honda, or any other member of the Honda Group, sells any of its businesses or assets, including personal data.

How do we secure your personal data?

We have taken the appropriate technical and organizational measures to protect your personal data from unauthorized access, theft, accidental loss, manipulation or destruction. However, you understand that the security of your personal data is an obligation of means (best effort). Access to your personal data by our personnel or the personnel of third parties is only done when necessary and is subject to appropriate confidentiality obligations.

Your Choices and Rights

(a) Your general choices and rights

- You have the right to ask Honda for a copy of your personal data; to correct or delete it or limit the processing of your personal data; and to obtain a copy of the personal data you provided us, in a structured machine-readable format.
- In certain circumstances, you may object to the processing of your personal data (particularly where we do not need to process the data to comply with a contractual or other legal obligation).
- Where we have asked for your consent, you may withdraw it at any time. If you ask to withdraw your consent for Honda to process your data, this will not affect the processing that has already taken place at that time.
- These rights may be limited, for example, if complying with your request would reveal personal data about another person, or if you ask us to delete information that we are required to keep because the law requires us to do so or because we have compelling legitimate interests in doing so.

(b) Uw choices and rights related to direct marketing

Honda will give you the opportunity to opt-in (consent) to have your contact information used for marketing purposes at the time we ask you to enter your data. If you do not wish for us to send you direct marketing materials, or for us to use your personal data for profiling in connection with direct



marketing, or for us to pass your data on to third parties for marketing purposes, you may ask not to do so at any time by:

- responding to an email for marketing purposes with “unsubscribe” in the subject line;
- changing privacy settings in an app (if applicable to the app);
- contact us at the address listed in 'contact us' or by writing to Honda Motor Europe Logistics, Langerbruggestraat 104, 9000 Gent, België

(c) Your right to complain to a supervisory authority

You also have the right to file a complaint with a data protection supervisory authority. The supervisory authority may be located where you live, or where you work, or where a breach of data protection obligations has occurred.

Data Retention

We will retain your personal data only as long as necessary for Honda's legitimate interest in accordance with applicable laws, or to provide a service at your request, or to comply with a legal requirement. In any case, the retention period of personal data will not exceed five years from the time the data was first collected by us, unless we are legally obliged to retain your data for a longer period by applicable law. At the end of the retention period, we will take the necessary steps to destroy your personal data or retain it in a form that no longer identifies you.

Fake emails in Honda's name

Honda is aware of fake emails, more commonly known as “phishing”. Such emails may contain announcements such as job advertisements, job offers and notifications of contest prizes. These emails use Honda's name to impersonate authenticity and are intended only to obtain personal information about customers (e.g., credit card numbers or passwords). Honda has nothing to do with these emails, and Honda does not use such methods for job advertisements or to communicate with contest winners.

Unfortunately, these fake emails are a growing form of Internet fraud. This practice is carried out either by sending a counterfeit e-mail directly to victims or by directing them to a Web site that requests personal information.

Fake job offers usually target individuals abroad, as the fraudsters ask them to send money to them for Belgian visas. Honda never asks for payment details in connection with job applications or communications in that regard. If in doubt about the validity of a job offer, please contact Human Resources, Honda Motor Europe Logistics, Langerbruggestraat 104, 9000 Gent, België.

Recent e-mail messages about contest prizes allegedly came from Honda. Honda never asks for payment information in connection with prize winners or communications in that regard.

Honda advises you to be very cautious if you receive an email on Honda's behalf asking for personal or financial information and if you have any doubts about its authenticity.



Links to third party websites

From time to time, our website may contain links to and from the websites of our partner networks, advertisers and Honda Group companies. Honda is not responsible for the content of websites linked to its website. When you visit a third-party website, it is your responsibility to review the privacy policy and legal terms applicable to that website.

Updates to this privacy statement

This privacy statement may be updated periodically. We will update the date at the top of this privacy statement accordingly and encourage you to check the Honda online content for changes to this privacy statement. In some cases, we will also actively alert you to specific data processing activities or significant changes to this privacy statement, as required by applicable laws.

Contact Us

The Honda online content is controlled by Honda Motor Europe Logistics (company number 0418.250.835), as the data controller for personal data that are being collected and processed via the Honda website. The registered offices are at Langerbruggestraat 104, 9000 Ghent, Belgium.

If you have any questions about this Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact us at HMEU.gdpr@honda-eu.com.