

# Privacy Policy

Last Updated: May 30, 2022

Automile Inc and affiliates (“us”, “we”, or “our”) operate websites, including without limitation [www.automile.com](http://www.automile.com) and any related URLs, mobile or localized versions and related domains/sub-domains (“Sites”) and provide a Service (“Service”) that requires us to collect some information from our users. This document outlines how we process your personal information when you for example visit our Sites, use the Service, or ask us for help through support request. It further explains the measures we take to protect our users’ data privacy.

If you have any concerns about providing your data to us, or how we process it according to this Privacy Policy, you should not use our Sites or our Service.

## Scope of this Privacy Policy

This Privacy Policy only concerns the processing of personal information for which Automile is the data controller, i.e. where we have decided the means and purposes of the processing of personal information. Our processing of personal information as a data processor is not covered. For more information about our responsibilities and undertakings in relation thereto, please refer to our Terms of Use.

## Keeping Your Data Secure

Protecting your data starts with our Automile hardware devices (“Hardware”). When data is transmitted from the Hardware to our cloud service we use best-in-class 256-bit wireless encryption. All data collected by our Hardware is securely hosted on our servers, but is owned by you. You can access this data through our web interface, smartphone apps and developer API. If at any point you decide to stop using Automile, simply contact us and we will permanently delete your data from our servers.

Automile will not sell, rent, or lease any personal data that could identify a specific individual to any third party. We may from time to time create and/or use aggregated or statistical anonymous data internally to improve or propose new features to our service. This data will never contain any information that could personally identify any of our users, and any use will meet both data privacy laws and our own Terms of Use.

## What Data Does Automile Collect and for What Use, and What is the Legal Basis for it?

Automile collects data about you and your vehicle to provide our Service through our Hardware and using our Apps. This includes vehicle data gathered with our Hardware, personal information you provide as a user of our web interface or mobile applications, or when you send us an email or submit a job application, information gathered while visiting our website, and personal information required for the processing of payments.

We will handle your personal information in order to comply with the contractual obligations we have under our agreement with you. We may also rely on our legitimate interest to handle your personal information (such as for administrative purposes, service improvement or to maintain a high level of security) or we will handle it as required by law.

### **Vehicle Data**

Once connected to your vehicle, our device collects information about your vehicle, which is securely transmitted to our cloud service. Information collected by the Automile Box includes fuel consumption, GPS location, vehicle diagnostic information, and triple axis motion detection. This information enables us to provide you with insights, as well as accurate and fully tax-compliant mileage logs.

### **Personal Information**

We collect personal information on our web interface and mobile applications, when you visit our Sites or request our help, apply for a job or communicate with us via social media, like user names, email addresses, telephone numbers, and mailing addresses. We will only collect personal identification information from you if you voluntarily submit such information to us. We will use this information to provide you with information, products and or Service that you request from us, to assess your eligibility for initial employment, or to carry out our obligations arising from any agreements entered into between us. This processing is necessary also to serve our legitimate interest. You may at any time decline to supply personal information, except that it may prevent you from engaging in certain features of our Service.

Automile takes comprehensive measures to ensure our platform, our customers, and their user data are safe from all cyber security threats. All communication through our web interface uses SSL/TLS for server authentication and data encryption. Even so, we cannot guarantee that a data breach will never occur. Any personally identifying information you elect to share on our web interface or in our mobile applications as a user will be at your own discretion.

### **Information We Collect When You Visit Our Website**

Like many sites, we use “cookies” to collect information, including your IP address. Cookies are files with small amounts of data that are sent to your browser from a website and stored on your computer’s hard drive. Cookies are widely used by online service providers to facilitate and help to make the interaction between users and websites, mobile apps and online platforms faster and easier, as well as to provide reporting information.

Our Sites use Google Analytics, a service which transmits website traffic data to Google servers in the United States. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. The information generated relating to our Sites is used to create reports about the use of the Sites. Google will store and use this information. Use the following link to review their privacy policies and cookie opt-out procedures: <http://www.google.com/analytics/learn/privacy.html>.

You can set your web browser to refuse cookies or to alert you when cookies are being transmitted if you so choose. You can also visit this website to opt out directly. If you do opt out, please note that some parts of our web interface may not function properly.

For more information on how we use cookies, please see our Cookie Policy.

### **How Long do We Keep the Data?**

We maintain information about you for as long as we provide services to you, and as long it is required for us to perform any related business activities. After your information is no longer necessary for our business purposes, we will destroy the information unless we have agreed with you that we should keep the information, or a court or administrative order is made to preserve the information, or if it is otherwise stipulated by law.

### **Who Can See the Data Automile Collects?**

Automile personnel access user data in order to provide Services and customer support to our users. We have developed internal processes to govern the way our personnel accesses user data. Internal access to this data is supervised to ensure user privacy.

From time to time we may work with third parties in the operation of our business or to administer services on our behalf, such as processing payments or sending out newsletters. In these instances, we may share some user information required to perform said operation or service. Such third parties may be situated in a country outside of EU/EES. Of course, we will take all steps reasonably necessary to ensure that your personal information is at all times treated securely and in accordance with applicable data privacy laws.

Automile may also disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights. In the event of legal demands for user data, we will attempt to notify said user unless prohibited by law or court order.

### **Changes to This Privacy Policy**

Automile may update this privacy policy from time to time. We encourage you to frequently check our webpage for any changes to this policy and to stay informed about how we protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically to become aware of modifications.

### **Do Not Track**

We do not respond to Do Not Track requests.

### **Your California Privacy Rights**

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or "CCPA." For more details about the personal information we have collected over the last 12 months, including the categories of sources, please see under "What Data Does Automile Collect and for

What Use, and What is the Legal Basis for it?” above. We collect this information for the business and commercial purposes described in this section. We do not sell (as such term is defined in the CCPA) the personal information we collect (and will not sell it without providing a right to opt out). Please note that we do use third-party cookies for our advertising purposes as further described in our Cookie Policy.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at [privacy@automile.com](mailto:privacy@automile.com). We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

### **Your Acceptance of These Terms**

Your continued use of our Services after any changes or revisions to this Privacy Policy represents your agreement to the terms of the revised Privacy Policy.

### **Your Choices and Automile Contact Information**

You have the right to access your personal information processed by Automile and may request a copy. If you have any questions regarding the Privacy Policy or the information we process, or any complaints regarding the way we are handling your data, contact [privacy@automile.com](mailto:privacy@automile.com) or write to us at Automile Inc, 13894 S. Bangerter Parkway Suite 200, Draper, UT 84020. You can also contact our Data Protection Officer on [dpo@abax.no](mailto:dpo@abax.no).

We will on our own initiative, or upon the request of you, rectify, delete, or complete any personal information in the register which we find is incorrect, unnecessary, inadequate, or outdated. You have the right to have incorrect details revised under certain circumstances. Please send such requests to [privacy@automile.com](mailto:privacy@automile.com) specifying what you would like to modify.

We will respond and/or implement your preferences within 30 days of receiving your request. In order to provide any personal information to you, we will verify your identity and authenticate your access right before doing so.

You can also object to certain personal information about you being processed and request that processing of your personal information be limited. Please note that the limitation or deletion of your personal information may mean we will be unable to provide you with our Services. You also have the right to receive your personal information in a machine-readable format and have the data transferred to another party responsible for data processing.

We are committed to handle any request, complaint or concern that you may have about our use of your personal information in a fair and transparent way. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the data protection authority in your country (if one exists in your country) or supervisory authority.

Our Sites and services may contain links to and from the websites of third parties such as our partner network. If you follow the link to any of these websites, please note that these websites may have their own privacy policies and we do not accept any responsibility or liability for the websites or these policies.