

Last Revised: 25th May, 2018

Privacy and Your Information

This Privacy Notice describes how we at Mobileye® use your personal information and respect your privacy rights.

In particular, this Privacy Notice explains how our products, services and technologies use your personal information. It applies to our use of personal information, unless, or to the extent that, a separate or supplementary privacy notice is published on Mobileye's website(s).

See [Privacy Notices for Specific Activities](#) for additional information relating to specific Mobileye activities.

What Kinds Of Information Do We Collect?

The personal information we collect will depend on the nature of your interaction with Mobileye (for example, you may provide products or services to Mobileye, you may purchase or use Mobileye products or services, or you may simply request information about Mobileye or its products), and may include the following types of information.

Mobileye collects information as part of its business operations, to provide services, to respond to requests and offer customer support, to fulfill legal and contractual obligations, and to build its innovative products. You provide some of this data directly, such as when you order a Mobileye product, contact customer support, or register for a Mobileye event or publication. We also collect information through your interaction with Mobileye products and services and our website, for example using embedded product technologies and cookies. We also obtain data from third parties.

Information You Provide to Mobileye Voluntarily

When you subscribe to a newsletter, create an account, make a purchase or request information from Mobileye, we may ask for things like contact, billing, shipping and communication information, payment card or financial account data, and account ID or credentials in order to fulfil your request. If you attend a trade show or event, or otherwise contact us, you may also voluntarily provide similar information to us.

Interactive features in some Mobileye products or services may allow you to invite friends, follow others, comment on or make unique posts, or share photos, video or other personal content. When you affirmatively share this content, we may collect and use it in accordance with this Notice. Additionally, by way of your engagement on social media, we may receive information about you from another user, such as when your friend posts content that includes you.

From time to time, we may engage in research, analysis and historical and scientific studies either alone or with partners. As part of such efforts, we may invite individuals to participate and to voluntarily share information through an informed consent process. When we receive personal information from a third party for the purpose of such research, we undertake processes to validate that the personal information has been collected in a responsible and lawful manner.

If you submit any personal information about other people to us, you are responsible for making sure that you have the authority to do so and to allow use of their personal information in accordance with this Privacy Notice (for example, by your asking for their consent).

Device and Product Operation

If you download and use certain Mobileye products or services like software or an app, we may track and collect usage data, such as when the software or app accesses our servers, what information and files have been downloaded using the software or app, and how you interact with the software or app during use. Some of this data may be protected as personal information under applicable data protection laws. We collect this information to understand how you interact with Mobileye and provide you the best experience. We may also use this information for security purposes. We may cross-associate the information we collect from more than one device that you use with other information that we have collected about you or your other devices.

In addition, most computing devices include embedded technology like processing chips that collect information about how the device is operating. This information may include:

- Type and version of operating system, hardware version, device settings, software types, battery and signal strength, screen resolution, device manufacturer and model, language, and Internet browser type and version. The name and version of any Mobileye services (such as the app) you are using is also collected.
- Geographic locations, such as through GPS, Bluetooth, or WiFi signals.
- Connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.

Access to this information by other applications and transmission of this information from the device to Mobileye or other service providers may be controlled by the operating system or other software running on the device.

Mobileye may also collect geographic location information, such as location inferred from your IP address or GPS, and information about how you engage with and use Mobileye products and services, for example where you have chosen to activate location-enabled services on the

device with which you access Mobileye services.

We collect information from and about a wide variety of technologies where Mobileye products and services are used. The kind of information collected depends on the technology, the use, the device and personal settings. Where we provide technology for autonomous vehicles, these may capture audio, video and photographs that unintentionally or incidentally capture people, for example workers in a field or pedestrians crossing a street. We use technical and organizational controls to prevent information from being used improperly, and we use this information to improve algorithms for product functionality and safety, including features such as mapping topography, obstacles, traffic and the like. More information about this may be found in our [Notice concerning Personal Information contained within Road Clips](#).

Information from Third Parties

We obtain information through partners, vendors, suppliers and other third parties. The parties from whom we obtain information are typically corporate enterprises (although some may also be educational or public enterprises) and they may be located in any of the locations in which we do business. These enterprises largely fall into the following categories: marketing companies, data set and information vendors, public database providers, social media platforms, customers, partners, providers of products or services, hosts or vendors at events or trade shows and research partners. We take steps to confirm that information we receive from these third parties has been lawfully collected or that these parties are otherwise permitted to disclose your personal information to us. We might also obtain information through a partner, or co-create datasets with a partner, as part of our business operations. This kind of data is used for work like improving algorithms and data models, product testing and improvement, enhancing existing products and developing new capabilities and features. In some cases we may combine personal information about individuals that we receive from multiple sources, including directly collected from you or through your use of the Mobileye products and services.

Through our Website & the Mobileye Services

We collect information about how you interact with our website and some Mobileye products and services using cookies, pixel tags, and similar technologies. Please view our [Mobileye Cookies and Similar Technologies Notice](#) for more information on our use of cookies and similar technologies, how you can manage cookies, and how we respond to 'Do Not Track' signals.

Call Center

When you call our call center, we may, in accordance with applicable law, record the call for training and quality assurance purposes. In such case, we will inform you in advance.

How We Use Information

We use information that we collect for lawful purposes associated with the growth, maintenance and management of our business, while also respecting your privacy. These uses include our internal operations and administration, communicating with you and fulfilling your requests for Mobileye products and services, for advertising and marketing, to monitor and maintain functionality and security of Mobileye products and services and to improve, develop, enhance and otherwise provide the Mobileye products and services.. The purposes for which we typically use information are:

To Communicate

We use contact information to send messages; to ship products and process payments; to respond to customer service requests; to provide alerts such as security updates or changes in our policies or about subscriptions that are ending; and to send advertising or informational materials like newsletters or white papers, in accordance with your communication preferences. We occasionally conduct surveys, offer contests or sweepstakes or do focused research or studies which may require you to voluntarily share personal information in order to participate. These activities typically have additional notices that provide more information about the use of your personal information and to which you may be asked to consent. Some Mobileye services may allow you to send messages to a “friend” or other contacts you provide or to “like” or post on social media. For information about managing the use of your contact data and to manage email subscriptions and promotional communications, please visit the [Your Choices & Rights](#) section of this Notice.

For Business Operations

We use information to operate our business; for example, to perform accounting, auditing, billing, reconciliation, and collection activities. Other business purposes that depend on use of your personal information include crime or fraud monitoring and prevention, protecting our legal rights, and performing contractual obligations. We also use personal information to contact you to advertise, market and sell Mobileye products and services in accordance with your communications preferences.

For Functionality, Development and Improvement

We use information to provide, offer, personalize and improve Mobileye products and services. Some information, like your IP address, may be used to communicate with your device to provide network connectivity, measure usage levels of Mobileye products and services, diagnose server problems and provide security features. Other business purposes that depend on use of your information may include data analysis related to testing, modifying, improving or developing new products, services and technologies, and to identify trends. We may collect the physical location of a connected device using satellite,

telecommunications tower, and WiFi signals to provide you with personalized location-based Mobileye services and content if you are using location-enabled Mobileye services. We use cookies to make our websites operate, work more efficiently, and provide analytic information. Technologies similar to cookies are also used in connection with some Mobileye products and services, such as pixel tags. For more information on Mobileye's use of cookies, please read our [Mobileye Cookies and Similar Technologies Notice](#).

For Product Updating and Reporting

Mobileye products and services may use information to provide software updates and reports and to check that they are working properly. Update functions may automatically check your system to see whether files need to be refreshed, updated, or modernized in order to provide you with the up to date security, versions, features, options and controls associated with your systems or devices. We rely on information to analyze performance and improve and maintain Mobileye products and services.

For Advertising

We may use your device's physical location, combined with information about what advertisements you viewed and other information we may collect, to enable us to provide personalized advertising content and to study the effectiveness of advertising campaigns. You may choose whether to allow or deny uses or sharing of your device's location by changing your device settings, but if you choose to deny such uses or sharing, we may not be able to provide you with certain personalized Mobileye services, content, and advertising.

Automated Decision-Making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review, which has legal or other significant effect. We may use automated analysis to make predictions such as your level of interest in particular products or services, or automated decision making to prevent theft, fraud or other crime. Artificial intelligence solutions may lead to automated processing of data in a variety of fields. In the event that our automated decision making would have a legal effect or significantly affect you we will implement measures to safeguard your rights, freedoms and interests, including performing privacy impact assessments to identify suitable measures to protect your rights, or obtain your explicit consent as required by applicable laws.

When and if we make this kind of automated decision about you, you have the right to contest

the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting us using the contact details provided at [How to Contact Us](#).

Legal Basis for Our Use (EEA Visitors Only)

If you are in the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, where we have a legal obligation to do so or where the processing is in our legitimate interests (such as processing for administrative purposes, direct marketing, product development or improvement, preventing fraud or criminal acts and in support of information security) and not overridden by your data protection interests or fundamental rights and freedoms.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the time of collection. We will also tell you whether the requirement for that information is mandatory and explain any consequences to you if you do not provide the information.

Similarly, if we collect and use your personal information based on our legitimate interests (or those of any third party), we will take reasonable steps to provide clear notice and describe our legitimate interests.

Mobileye Vision Technologies Ltd. is the Data Controller of all personal information collected in the EEA, except where a supplemental privacy notice says otherwise. The contact details for Mobileye Vision Technologies Ltd. are set out at [How to Contact Us](#).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information for any specific processing activity, please contact us using the contact details provided at [How to Contact Us](#).

How We Share Information

We share personal information for reasons like fulfilling orders, processing payments, preparing and sending advertising campaigns, or as otherwise necessary to complete any transaction or provide any product you have requested or authorized. Where sharing takes place, we use controls to establish protections for the personal information that is shared. Sharing may take place with affiliates and subsidiaries; suppliers working on our behalf; law enforcement or government official and for purposes consistent with this Notice including to protect our customers; to protect lives; to maintain the security of Mobileye products and services; and to protect our rights and property.

With Affiliates and Subsidiaries

For purposes limited to and consistent with this Privacy Notice.

With Suppliers

Our authorized vendors and suppliers may require personal information to provide products and services we have contracted for, such as product delivery, website hosting, data analysis, IT services, auditing, payment processing or customer service. We use a wide variety of software and tools at Mobileye and we process personal information using these tools as a regular course of business. Our contracts with suppliers and vendors include provisions to protect your information and limit its use.

We also share non-personally identifiable information, such as anonymized or aggregated information, with third parties for purposes such as analysis, identifying trends in the areas of our products and to help research and develop new Mobileye products and services.

With Partners

We occasionally have relationships with third parties that are not suppliers or vendors but are working with us to offer certain opportunities such as sweepstakes, contests, and similar promotions, to enable joint products or research studies, or to facilitate services like message boards, blogs or other shared platforms. In these cases, additional terms or privacy notices may be provided. For third parties or uses not described in this Notice, we share your information only with a lawful basis to do so.

For Advertising

We may share your information with our third party advertising company partners to prepare and deliver advertising content, to provide content services and to enable them to provide you with more personalized ads and to study the effectiveness of our advertising campaigns.

In particular, we may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you, in accordance with your marketing preferences. You may receive our advertising by a variety of means such as email, phone or when you access and use the Mobileye products and services and other web sites. Content may be based on information obtained, for example, through prior purchases or transactions, through your device's physical location, through information about what advertisements and content you have viewed, or through cookies and similar technologies relating to your access to and use of Mobileye services and other web sites. Please read our [Mobileye Cookies and Similar Technologies Notice](#) for more information. You can choose whether to allow or deny uses and/or sharing of your device's location by changing your device settings, but if you choose to deny such uses or sharing, our marketing partners may not be able to provide you

with the applicable personalized Mobileye services, content, and advertising.

Mobileye does not share your personal information with non-affiliated third parties for their own marketing use without your permission.

Sales, Mergers or Acquisitions

We may disclose personal information as part of a contemplated or actual corporate transaction such as a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Research and Study

We may disclose personal information to collaboration partners to conduct research to improve our technology, or the use of our technology, in various fields of study and to identify new uses or design new products.

With Your Consent

Mobileye may disclose your personal information to any other person or entity where you consent to the disclosure.

Your Choices & Rights

Mobileye respects your rights with regard to how your personal information is used and shared. You may request access or corrections to your personal data and make choices about the kinds of marketing materials you receive (or choose not to receive marketing from Mobileye at all). If you are in the EEA, you may have additional rights under the GDPR; further additional choices and rights may be available to you depending on which Mobileye products or services you use.

Access, Correction to or Deletion of your Information

If you would like to correct or update your personal information, or to request access to or deletion of your personal information, you may contact us by sending a letter to one of the postal addresses listed at [How to Contact Us](#) including your name, email address, account identification, and purpose of the request. If you request a change to or deletion of your personal information, please note that we may still need to retain certain information for recordkeeping purposes, and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of such purchase or promotion). Some of your information may also remain within our systems and other records where necessary for compliance with applicable law.

At your request and where the law requires us to do so, we will confirm what personal

information we hold about you. You may also have a legal right to obtain a copy of your personal information. You can make such a request by making a written request in one of the ways described at [How to Contact Us](#). We may charge a processing fee for this service where permitted by law and we will require evidence of your identity before fulfilling your request.

Data Privacy Rights Specific to Residents of the European Union

If you are in the EEA, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. You can exercise these rights by making a written request in one of the ways described at [How to Contact Us](#).

Similarly, if we have collected your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect (1) the lawfulness of any processing we conducted prior to your withdrawal, or (2) our right to continue to process your personal information under other legal bases.

If you believe we are using your personal information in a way that is inconsistent with this Privacy Notice or for more information about your rights, contact your local data protection authority (contact details for data protection authorities in the European Economic Area are available [here](#).)

Advertising Choices

We give you many choices regarding our use and disclosure of your personal information for marketing purposes. You may access or update your contact details and modify your communication preferences by using one of the following methods, as applicable: visiting the specific product or service web site; using the “unsubscribe” link in a marketing communication; or by sending a letter to one of the postal addresses at [How to Contact Us](#). Please also note that if you choose not to receive marketing from us, we may still send you communications related to Mobileye products and services, such as information about a security update, billing issue or product delivery.

Other Privacy Related Information

Below you will find additional information you may find important such as how we communicate changes to this notice, our data retention practices, international compliance, working with minors’ personal information and information security.

Security

The Mobileye products and services are designed to provide reasonable and appropriate administrative, technical and organizational security measures to protect your personal information against risks such as temporary or permanent loss, destruction, and unauthorized

or unlawful access, alteration, use or disclosure. We require our suppliers and vendors to apply similar protections when they access or use personal information that we share with them. Users of Mobileye products and services must also do their part in protecting the data, systems, networks, and service they are utilizing. No technology, data transmission or system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that your password to any Mobileye account has been compromised), please immediately notify us by contacting us using the instructions at [How to Contact Us](#).

Personal Information of Minors

We do not knowingly collect personal information from minors without proper consent from a parent or legal guardian. If you believe that we may have collected personal information from a minor without the requisite consent, please let us know using the methods described at [How to Contact Us](#) and we will investigate and promptly address the issue. For these purposes, we define a "minor" to mean an individual who is under the age of majority in the territory in which they are resident.

International Compliance

Mobileye is a global company with its headquarters in Israel. As such, we may transfer your personal information between Israel and our affiliates and subsidiaries in other countries. We may also transfer your personal information to our third party service providers, who may be located in a different country to you.

We transfer information in order to operate efficiently, to improve performance, and to create redundancies in order to protect information in the event of an outage or other problem. We will process your personal information in a way that meets the commitments of this Notice and complies with the law wherever we transfer it.

Whenever Mobileye transfers personal information beyond the country of origin, we will do so in accordance with applicable laws. For personal information originating in the European Economic Area (EEA) that is transferred to a Mobileye entity outside the EEA that does not have an "adequate level of protection" as determined by the European Commission, we rely on other lawful measures, such as contracts that include the EU standard contractual clauses. You can review the EU Standard Contractual Clauses on the European Commission's website [here](#).

Retention

We retain personal information for the period necessary to: provide requested Mobileye products and services, as needed to comply with legal obligations (e.g. maintaining opt-out lists to fulfill advertising choices or to comply mandatory record retention or legal hold

requirements), as agreed in an individual consent, to resolve disputes, and to otherwise fulfill the purposes, rights and obligations outlined in this Privacy Notice. Retention periods can vary significantly based on the type of information and how it is used and our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When personal information is removed from our systems, it will be deleted or destroyed using appropriate security protocols so that it cannot be reconstructed or read.

Third Party Sites & Services

This Privacy Notice does not address, and we are not responsible for, the policies and practices of third parties or other organizations that are not operating on Mobileye's behalf, including policies and practices related to privacy and security, data collection, processing, use, storage, and disclosure. This includes: (a) any third party operating any site or service to which Mobileye links – the inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates; or (b) any app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer (such as Facebook, Apple, Google, Microsoft, LinkedIn, etc.) – including any personal information you disclose to other organizations through or in connection with the Mobileye products and services or our corporate social media pages.

Changes to this Privacy Notice

We may change this Privacy Notice from time to time so it accurately reflects our practices, the Mobileye products and services and legal requirements. The Last Revised note at the top of this Notice states when this Privacy Notice was last amended and we update this date each time a revision is posted. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on the Mobileye website(s). You should check back regularly to stay informed of our privacy practices.

If any change to our Privacy Notice materially affects the use of your personal information, we will use reasonable efforts to notify you in advance, such as by sending an email or posting a prominent notice of the changes on our website, and give you a reasonable period of time to object to any changes. In some cases, objecting to changes may affect the availability or functionality of the Mobileye products and services available to you. We will treat your continued use of the Mobileye products and services after the effective date of any updated Privacy Notice as your acceptance of the changes we have made. However, we will seek your affirmative consent to any material changes in our use of your personal information as described in an updated Privacy Notice if and where this is required by applicable data protection laws.

We encourage you to periodically review this Privacy Notice to stay informed about how we

collect, use, and share personal information.

Privacy Notices for Specific Activities

Notice concerning Personal Information contained within Road Clips

1. Identity, Contact Details and Representative of Controller

The controller is *Mobileye Vision Technologies Ltd.* of Hartom 13, Jerusalem, 9777513, Israel, email: privacy@mobileye.com. The controller's representative within the EEA is its affiliate *Mobileye Germany GmbH* of Emanuel-Leutze-Str. 21, 40547 Düsseldorf, Germany.

2. Collection of Road Clips

Certain test-vehicles operated by Mobileye itself or by our customers are fitted with prototype products which, as those vehicles are driven along the road, collect and store a video-recording of the outside of the vehicle in the form of a series of short clips ("**Clips**"). Naturally, Clips may contain personal information ("**PI**", which is information relating to an identified or identifiable natural person, e.g., a facial image or a vehicle license-plates). In the case of customer-operated test-vehicles, Clips are conveyed to us via secure file transfer or on physical disks. (Mobileye customers may also retain copies of Clips, recorded by a Mobileye product, for their own internal purposes.)

3. What does Mobileye do with Clips ? (the 'purpose of processing')

Mobileye uses Clips for internal product development, validation, testing and research purposes. In particular, we use them to 'train' and test our technology; principally, to improve its accuracy at identifying the various objects found on the road. Thus, to the extent that Clips contain PI, Mobileye is interested in it only in its generic form (that is, the generic shape or appearance of a face or a license-plate, not the details of a particular face or license-plate), so that, for example, our technology can become even better at identifying pedestrians and distinguishing them from other road traffic.

4. Mobileye's Minimization of Personal Information

Mobileye takes various steps to minimize the very amount of PI contained within Clips in the first place, e.g. by compression. (Non-compressed Clips are nonetheless retained, but used only to stress-test innovative Mobileye code

against 'real life' footage – for example, a Mobileye developer might wish to test an innovation in pedestrian detection against a large number of Clips containing rainy nighttime scenes, in which weather pedestrians are inherently less visible. In this case, the new code is simply executed against Clips 'in the background' and the developer sees only the results.)

5. What is Mobileye's legal basis for collection and use of Clips ? (the 'legal basis for the processing')

Mobileye has a legitimate interest in collecting and using the Clips for the above purpose, which is to improve our technology powering advanced driver assistance solutions and due eventually to power autonomous vehicles, which are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

6. Transfer of Clips outside of Mobileye ('categories of recipients of personal information')

Clips 'leave' Mobileye in only a few, specific scenarios:

- (i) Where Clips are stored with third party processors, leveraging such processors' massive computing power and real-time scalability; or
- (ii) Where Mobileye shares a certain number of them, *in compressed form*, with off-site employees in Israel or external contractors, for the purpose of tagging, i.e., where humans 'tag' certain features of a Clip in order to train and refine Mobileye software's identification accuracy; or for after-the-fact review of computerized tagging, i.e. where humans review and check Mobileye software's identification accuracy; or
- (iii) Where Mobileye shares a very small number of individual Clips with third-party customers or partners for business-related purposes; or
- (iv) Where, in order to demonstrate how Mobileye technology works, Clips are featured on Mobileye's various websites or social media channels, or senior Mobileye officers play them before an audience of customers or potential customers, or at a corporate or trade event. In any event, the number of Clips involved is minimal and any PI within the Clips will be blurred where practicable.

Transfer of Clips under sub-sections (i)-(iii) is done either (i) through upload to and download from secure private services (and not through third-party web-based

services) or (ii) on physical media with reputable international couriers (the physical media is secured through encryption or other technical means).

In the case of transfer of Clips to third countries, Mobileye relies on a combination of European Commission adequacy decisions and standard data protection clauses.

7. Clip Retention Duration

Mobileye retains the Clips for as long as they continue to be useful for the purposes stated above, or in accordance with applicable laws, whichever is shorter.

8. Individuals' Rights in respect of their PI contained within a Clip or Clips

Individuals have various rights under the EU's General Data Protection Regulation in respect of PI pertaining to them. However, please note that these rights are necessarily limited due to the fact that Mobileye neither collates nor indexes PI (there is no mechanism allowing, for example, a search through the Clips database for a frame or frames containing any particular vehicle or individual). As a result, it is highly unlikely that Mobileye would be able to identify a particular individual within its Clips database unless that individual could provide additional information, such as the location and time at which he/she believes the relevant Clip or Clips were collected*.

Nonetheless, Mobileye will respond to any requests on a case-by-case basis.

*In the unusual case where an individual registers an objection with the driver of a Mobileye-operated test-vehicle in real or close-to-real time, drivers are instructed to make a record of such objections and to relay them to us for review. In such exceptional case, by contrast to the above, it would usually be possible to identify and delete the relevant Clip or Clips.

9. Individuals' Right to Lodge a Complaint

An individual may lodge a complaint with their local supervisory authority. A list of supervisory authorities (correct at the time of publication of this Notice) may be found [here](#).

Notice concerning Personal Information contained within Road Segment Data collected by OEM Vehicles

1. Identity, Contact Details and Representative of Controller

The controller is *Mobileye Vision Technologies Ltd.* of Hartom 13, Jerusalem, 9777513, Israel, email: privacy@mobileye.com. The controller's representative within the EEA is its affiliate *Mobileye Germany GmbH* of Emanuel-Leutze-Str. 21, 40547 Düsseldorf, Germany.

2. What is Road Segment Data ?

Certain vehicles collect and transmit data about their driving path, which we refer to as 'road segment data' or RSD. RSD is a mathematical representation (strings of alphanumeric metadata) of the streetscape, containing the location of various static, non-transient road landmarks around the vehicle, such as traffic lights and road signs, as well as dynamic data such as the existence of potholes, parking spaces etc.

Each piece of RSD also contains time and geolocation stamps.

3. What is an OEM Vehicle and which OEM Vehicles collect RSD ?

An OEM Vehicle is a vehicle into which Mobileye technology is integrated, by its manufacturer, during manufacture (as opposed to "**Aftermarket Fleet Vehicles**", vehicles into which Mobileye's aftermarket Mobileye 8 Connect™ is retrofitted after manufacture). OEM Vehicles running software on certain iterations of Mobileye's EyeQ® chip collect RSD.

Note: The collection of RSD by Aftermarket Fleet Vehicles is addressed [in a separate notice](#).

4. Does OEM Vehicle RSD contain personal information ("PI", being information relating to an identified or identifiable natural person) ?

It is the manufacturer of the relevant OEM Vehicle which first receives the RSD. Before transmitting the RSD to Mobileye, the manufacturer strips the RSD of any potential PI (even for itself) in some or all of the following ways: (i) obfuscating the vehicle's identity, (ii) deleting RSD pertaining to the first few and last few minutes of a journey, and (iii) removing a pro rata portion of each journey – e.g. 1

km in every 10 km. The RSD retains its time and geolocation stamps – both of which are essential since, in order to generate a Roadbook (as described below), we necessarily have to know where and when the RSD was collected. Neither time nor location information is, alone, enough to identify the vehicle which collected the RSD in question.

While we believe that RSD received from OEM-Vehicle manufacturers is anonymized, this Notice is provided in case such RSD may be deemed to contain PI or pseudonymized PI.

5. **What does Mobileye do with RSD ? (the ‘purpose of processing’)**

Mobileye aggregates and reconciles RSD received from relevant vehicles, resulting in a highly-accurate and virtually real-time map called a Roadbook™.

6. **What is Mobileye’s legal basis for collection and use of RSD ? (the ‘legal basis for the processing’)**

Mobileye has a legitimate interest in collecting and using the RSD, an essential element of the autonomous and quasi-autonomous vehicle ecosystem. Autonomous vehicles are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

7. **Transfer of RSD outside of Mobileye (‘categories of recipients of personal information’)**

Mobileye may share ‘raw’ RSD with, for example, mapmakers. However, such raw RSD, and, *a fortiori*, a Roadbook derived from aggregated and reconciled RSD contain no PI. In the case of transfer of RSD to third countries, Mobileye relies on a combination of European Commission adequacy decisions and standard data protection clauses.

8. **RSD Retention Duration**

As stated above, the main use of RSD is in its aggregation and reconciliation into a Roadbook. Raw RSD is nonetheless retained for as long as it continues to be useful, or in accordance with applicable laws, whichever is shorter.

9. **Individuals’ Rights in respect of their PI**

Individuals have various rights under the GDPR in respect of PI pertaining to them.

Mobileye will respond to any requests to exercise these rights on a case-by-case basis.

10. Individuals' Right to Lodge a Complaint

An individual may lodge a complaint with their local supervisory authority. A list of supervisory authorities (correct at the time of publication of this Notice) may be found [here](#).

Notice concerning Personal Information contained within Road Segment Data collected by Aftermarket Fleet Vehicles

1. Identity, Contact Details and Representative of Controller

The controller is *Mobileye Vision Technologies Ltd.* of Hartom 13, Jerusalem, 9777513, Israel, email: privacy@mobileye.com. The controller's representative within the EEA is its affiliate *Mobileye Germany GmbH* of Emanuel-Leutze-Str. 21, 40547 Düsseldorf, Germany.

2. What is Road Segment Data ?

Certain vehicles collect and transmit data about the vehicle's driving path, which we refer to as 'road segment data' or RSD. RSD is a mathematical representation (strings of alphanumeric metadata) of the streetscape, containing the location of various static, non-transient road landmarks around the vehicle, such as traffic lights and road signs, as well as dynamic data such as the existence of potholes, parking spaces etc.

Each piece of RSD also contains time and geolocation stamps, and, in the case of collection by Aftermarket Fleet Vehicles, the serial number of the Mobileye system which collected it.

3. What is an Aftermarket Fleet Vehicle and which Aftermarket Fleet Vehicles collect RSD ?

An Aftermarket Fleet Vehicle is a vehicle belonging to a corporate fleet into which Mobileye's aftermarket Mobileye 8 Connect™ system is retrofitted after manufacture (as opposed to "**OEM Vehicles**", vehicles into which Mobileye technology is integrated, by its manufacturer, during manufacture). Aftermarket Fleet Vehicles collect RSD.

Notes: The collection of RSD by OEM Vehicles is addressed [in a separate notice](#). The Mobileye 8 Connect system may in future also collect telematics data; this will be addressed in a separate notice which will be published at that time.

4. Does Aftermarket Fleet Vehicle RSD contain personal information (“PI”, being information relating to an identified or identifiable natural person) ? Unlike in the OEM Vehicle case, Mobileye receives RSD directly from Aftermarket Fleet Vehicles, but the RSD is linked by the serial number with the specific Mobileye 8 Connect systems fitted into those Vehicles. Except as set out below, Mobileye cannot practically link the relevant systems to the Vehicles into which they are fitted as the systems’ serial numbers bear no direct relationship to any identifying feature (e.g. the license number) of the Vehicles carrying them. In any event, the serial numbers of the specific Mobileye 8 Connect systems are irrevocably deleted shortly after receipt of the relevant RSD.

There is one exception: where the owner of specific Vehicles has requested this, Mobileye will ‘associate’ the systems to the *fleet* to which those Vehicles belong, by replacing the system serial numbers with an identifier of the relevant fleet. So, in that case, Mobileye will be aware that particular RSD was collected by a vehicle belonging to a particular fleet, *but not which specific vehicle*.

All RSD sent to Mobileye is protected in transit by technical and organizational measures.

The RSD also carries time and geolocation stamps – both of which are essential since, in order to generate a Roadbook (as described below), we necessarily have to know to where and when the RSD was collected. Neither time nor location information is, alone, enough to identify the vehicle which collected the RSD in question

Thus, the Aftermarket Vehicle RSD may contain PI where it is ‘associated’ to a particular fleet, or where it may otherwise be deemed to contain PI or pseudonymized PI.

5. What does Mobileye do with RSD ? (the ‘purpose of processing’) Mobileye aggregates and reconciles the RSD received from relevant vehicles, resulting in a highly-accurate and virtually real-time map, called a Roadbook.

6. What is Mobileye’s legal basis for collection and use of RSD ? (the ‘legal basis for the processing’)

Mobileye has a legitimate interest in collecting and using the RSD, an essential element of the autonomous and quasi-autonomous vehicle ecosystem. Autonomous vehicles are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

7. Transfer of RSD outside of Mobileye (‘categories of recipients of personal information’)

Mobileye may share ‘raw’ RSD with, for example, mapmakers. However, such raw RSD, and, *a fortiori*, a Roadbook derived from aggregated and reconciled RSD contains no PI. In the case of transfer of RSD to third countries, Mobileye relies on a combination of European Commission adequacy decisions and standard data protection clauses.

8. RSD Retention Duration

As stated above, the main use of RSD is in its aggregation and reconciliation into a Roadbook. Raw RSD is nonetheless retained for as long as it continues to be useful, or in accordance with applicable laws, whichever is shorter.

9. Individuals’ Rights in respect of their PI

Individuals have various rights under the GDPR in respect of PI pertaining to them. Mobileye will respond to any requests to exercise these rights on a case-by-case basis.

10. Individuals’ Right to Lodge a Complaint

An individual may lodge a complaint with their local supervisory authority. A list of supervisory authorities (correct at the time of publication of this Notice) may be found [here](#).

How to Contact Us

If you have questions or concerns about Mobileye’s privacy practices, or to exercise any of your rights and choices as described in this Notice, you can contact us using any of the following methods:

- (1) By email to privacy@mobileye.com;
- (2) By sending a letter to the postal address listed below. Please include your contact details and

a detailed description of your request or privacy concern.

Mobileye Vision Technologies Ltd.

Attn: Legal Department

13 Hartom St. Har Hotzvim,

Jerusalem, Israel 9777513

- (3) In the European Economic Area, by contacting our European Data Protection Officer at the address set forth below. Please include your contact details and a detailed description of your request or privacy concern.

European Data Protection Officer

Mobileye Germany GmbH

Emanuel-Leutze-Str. 21,

40547 Düsseldorf,

Germany