

Privacy Policy of Alliance Tire Europe B.V. (“Privacy Policy”)

Alliance Tire Europe B.V. (“ATE B.V.”) understand the importance of respecting and safeguarding the privacy of customers and visitors to our website, [www.yokohama-oh.com]. This Privacy Policy sets out our approach to dealing with your personal data. It explains what types of information we collect through the Site, how we use that information, to whom we may disclose it and how you can contact us if you have any questions about this policy.

When we refer to ATE B.V., “we” “us” or “our” in this Privacy Policy, we are referring to ATE B.V., and its affiliates that are responsible for processing your data. ATE B.V., is the controller and is responsible for the ATE B.V.’s Site. By continuing to access or using the ATE B.V., Site you signify your acceptance to the terms of the ATE B.V., Privacy Policy. We reserve the right to revise this Privacy Policy at any time to reflect the changes in law or our personal data collection and use practices. If changes are made to this Privacy Policy, any updated versions will be posted on the ATE B.V.’s Site so please check back frequently for any updates to this Privacy Policy. If any material updates are made to this Privacy Policy, we will provide notice, including by banner on the ATE B.V.’s Site.

The ATE B.V., Site is not intended for children and we do not knowingly collect data relating to children.

You have a right to make a complaint at any time to Human Resources Manager HR.Europe@yokohama-oh.com. We would however, appreciate the chance to deal with your concerns before you approach them, so please contact us in the first instance.

Third-Party Links

The ATE B.V., Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the ATE B.V., Site, we encourage you to read the privacy policy of every website that you visit.

In particular, the ATE B.V., Site uses website analytics, including but without limitation to, Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the ATE B.V., Site. The information generated by the cookie about your use of the ATE B.V., Site (including your IP address truncated by the last octet prior to its storage using the “_anonymizeIp()” method) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the ATE B.V., Site, compiling reports on ATE B.V., Site activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the ATE B.V., Site. By using the ATE B.V., Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

You can opt-out from being tracked by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>.

The Data that we Collect about You

We collect two broad categories of data:

Personal Data. The data that we collect includes but is not limited to:

- (i) personal information that can be used to identify an individual, such as name, date of birth, passport or other personal identification numbers;
- (ii) contact information, such as mailing address, phone number email address;
- (iii) information on your prior interactions with members of ATE B.V., including emails, letters and other communications;
- (iv) business contact information, such as the contact details of employees of our customers.

Technical Data. This includes device and technical information you give us when using the ATE B.V., Site, such as IP addresses or other unique identifiers, cookies, mobile carrier, time zone setting, operating system and platform.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

How Your Personal Data is Collected

We use different methods to collect data from and about you, including through:

Direct Interactions: You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- request information about our products or services;
- create an account on the ATE B.V., Site;
- Subscribe to our newsletters and other publications;
- request marketing material be sent to you;
- enter into a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies / interactions and third party sources: We may automatically collect your personal information as you interact with the ATE B.V., Site (such as browsing actions, patterns, hardware model, device ID, operating system version, web-browser software and your Internet Protocol address/MAC address/device identifier). We may also receive your personal data from various third parties and public sources as required or permitted by applicable law (such as public databases, credit

bureaus, ID verification partners, resellers and channel partners, joint marketing partners and social media platforms).

Our servers are located in India.

If you Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract that we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case we may have to cancel a product or service that you have with us but we will notify you if this is the case at the time.

Purposes for which we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where:

- we need to perform the contract we are about to enter into or have entered into with you;
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- we need to comply with a legal obligation.

We have set out below, a description of the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need further details about the specific legal ground we are relying on to process your personal data:

Purpose of Information Gathering

ATE B.V.'s primary goal in collecting personal information is to provide you with a customised experience. This includes personalisation services, interactive communications, online commerce, and many other types of service. By knowing a little about you, ATE B.V. is able to deliver better service and more relevant content to you.

We use your personal data as follows in order to meet our contractual obligations to you:

- We collect your personal data in order to perform our obligations in relation to a sales or customer services contract with you;
- We collect personal data of candidates applying for a job in order to get into contact with the applicant and to have a base for the decision over the application;

As it is in our legitimate interests to be responsive to you, to provide customised services and marketing and to ensure the proper functioning of our products, services and organisation, we will use your personal data to, based on your communications preferences:

- improve the ATE B.V., Site and ensure content from the ATE B.V., Site is presented in the most effective manner for you and your device;
- administer the ATE B.V., Site for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- send you marketing communications to inform you about our events or our partner events; to deliver targeted marketing and advertising although you can object to this and opt out of receiving such targeted marketing;
- customise our products and services to you;
- keep the ATE B.V., Site secure;
- provide you with promotional offers and enable you to participate in competitions and games.

Information Shared with Third Parties

- From time to time we will need to share your personal information with third parties. We will only share your information with third parties who have a legitimate purpose for accessing it, particularly: We share your information with third party identity verification services in order to prevent fraud;
- We share your information with services providers who provide consultancy, banking, legal, insurance and accounting services under contract and who help with parts of our business operations;
- We may share your information with companies or entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal data.; and
- We share your information with law enforcement, officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of personal data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our user agreement or any other applicable policies.

We require all third parties to respect the security of your personal data and to treat it in accordance with the Privacy Policy and applicable laws.

You may refuse to consent to having your personal information shared with third parties, or allowing us to use your personal data for any purpose that is incompatible with the purposes for which we originally

collected it or subsequently obtained your authorisation. If you choose to do so, certain features of the ATE B.V., Site and certain services that we provide may not be available to you.

Cookies

A “cookie” is a small amount of data that is sent to your browser from a web server and gets saved on your computer hard drive temporarily. These cookie files store and sometimes track information about what you do on the site. This information makes it possible for us to offer and provide highly customized services. If you do not wish to have cookies stored on your computer, you can modify your browser to reject all cookies, or to notify you when a cookie is set. The “help” portion of the toolbar on most browsers will tell you how to do this. If you choose to reject all cookies, however, you will be unable to use those ATE B.V., Site services that require submission of information by you in order to participate.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

International Transfers

Your personal data may be transferred, stored, and processed in any country in which we operate.

Data Subjects of the European Economic Area (“EEA”) Only:

Where we transfer your personal data outside of the EEA, this is done either on the basis that it is necessary for the performance of the contract between you and ATE B.V., or that the transfer is subject to the European Commission’s model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses), pursuant to Decision 2004/915/EC and Decision 2010/87/EU as appropriate or, in the event that the transfer is to a US entity, we may transfer personal data if the transferee is part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Your Legal Rights

If you are not a resident in the EEA, you may have certain rights in relation to the personal data that we hold about you. Please contact our Data Protection Officer for more information about those rights.

If you are resident in the EEA, you may have certain rights, which include the right to:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data that you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Your rights in relation to your personal data are not absolute. Access may be denied when:

- denial of access is required or authorised by law;
- granting access would have a negative impact on another's privacy;
- to protect our rights and property; and
- where the request is frivolous or vexatious.

If you wish to exercise any of the rights set out above, please contact us. Note that we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator or a breach where we are legally required to do so.

Unfortunately the transmission of information via the internet is not completely secure. We will do our best to protect your personal data but we cannot guarantee the security of your personal data transmitted through the ATE B.V., Site and any transmission is at your own risk.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting

requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your Duty to Inform us of Changes

It is important that the personal data that we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.