

Enacted on March 21, 2025

Hitachi Astemo Privacy Notice/Privacy Policy for Data Collection through On-Board Cameras in the United States of America

1 Introduction

Hitachi Astemo, Ltd. (“Hitachi Astemo”, “we”, “us”, and “our”) drives test vehicles and uses on-board cameras in order to collect images around the test vehicles and records the images on the storage devices installed in the test vehicles, for the purpose of developing our products and services. Such collected images may include your personal information as described in Section 2.2.

In this privacy notice/policy (this “Policy”), we have provided basic policy regarding your personal information which may be contained in the images collected by on-board cameras in some states of the United States of America (this “USA”).

Except as otherwise provided, this Policy provides additional information to residents pursuant to applicable U.S. state privacy laws.

This Policy describes why and how we collect, use, and disclose or otherwise process personal information of individuals within the United States, what rights these individuals may have with respect to their personal information, and how they may exercise their rights.

For purposes of this Policy, the term “personal information” has the meaning given to “personal data”, “personal information” or other similar terms in U.S. state data privacy and protection laws, except that in neither case does such term include information exempted from the scope of such laws.

This Policy was last updated on March 21, 2025. However, the Policy can change overtime, for example to comply with legal requirements. The most up-to-date version can be found on this website.

2 Personal information which we process

2.1 Categories of sources from which we collect personal information

We may collect personal information by driving test vehicles on public roads in

certain U.S. states and recording images around the test vehicles using on-board cameras (hereinafter, the “Recorded Images”).

2.2 Categories and specific pieces of personal information which we process

The Recorded Images may contain personal information visible from public streets, such as the license plates of vehicles around the test vehicles (hereinafter, the “Personal Information”). The Recorded Images may capture other non-personal information, such as appearances and behaviors of passers-by, as well as their whereabouts and date and time.

Such Personal Information belongs to the category of identifiers.

2.3 Specific business or commercial purpose for collecting Personal Information from consumers

The purpose for which we collect the Recorded Images is to develop an advanced driver-assistance system (“ADAS”) and related products and services, subject to the data retention limits described below.

2.4 Whether we share or sell Personal Information

We will not share or sell Recorded Images which may include your Personal Information. Therefore, we will not share or sell your Personal Information.

Each term of “share,” and “sell,” shall have the meaning given in the California Consumer Privacy Act of 2018, as amended (“CCPA”) or other applicable U.S. laws governing consumer data privacy.

In addition, we will not process Recorded Images for the purpose of targeted advertising or for the purpose of profiling the consumer in furtherance of decisions that produce legal effects or effects of similar significance.

2.5 Whether we disclose Personal Information

We do disclose Recorded Images with the companies of our corporate group.

2.5.1 Categories of Personal Information that we disclose to third parties

We disclose Recorded Images to third parties.

2.5.2 Categories of third parties to whom Personal Information is disclosed

We disclose Recorded Images to the following third parties:

- Automobile manufacturers with whom we develop ADAS and related products and services
- Our service providers who help us analyze such images
- Our service providers who provide us with different kinds of cloud services we use as our development platform
- Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate.
- Prospective counterparties and their advisers in the context of potential of actual corporate events, including as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

2.5.3 Specific business purpose for disclosing consumers' Personal Information

We disclose Recorded Images with third parties for the purposes described in Section 2.3.

2.6 Children's privacy

The Recorded Images may include personal information about children under the age of 16, but we will not sell or share any Recorded Images.

Therefore, we do not sell or share personal information about children under the age of 16.

2.7 Sensitive personal information

Recorded Images does not include sensitive personal information about consumers.

In addition, we will not store or disclose or transfer sensitive personal information extracted from Recorded Images by performing image processing .

Therefore, we do not disclose or use sensitive personal information.

2.8 How long we retain your Personal Information

We will retain Recorded Images only for the period necessary to process such Recorded Images, except to the extent that we are required by law to retain it for a longer period of time, in which case, we will retain it for the period required by law.

Personal Information we collect	CCPA statutory category	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” or “share” PI
<i>Personal Information contained in Recorded Images</i>	<i>Identifiers (other)</i>	<ul style="list-style-type: none"> • <i>Automobile manufacturers</i> • <i>Service providers</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> 	<ul style="list-style-type: none"> • <i>N/A</i>

3 Privacy rights you have.

You may have some or all of the rights regarding your Personal Information that we collect and process under applicable data protection and privacy laws. However, these rights are not absolute and some data protection and privacy laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law.

3.1 Right to know and access

You have the right to obtain Personal Information regarding our data processing activities that concern you, such as how we collect and use your Personal Information, how long we will keep it, and who it will be disclosed to, among other things.

3.2 Right to correct and right to delete

You may request that we make a correction or deletion on the content of your Personal Information we hold.

3.3 Right not to receive discriminatory treatment

We will not discriminate against you for exercising any of your privacy rights.

3.4 Right to Appeal

You can appeal our denial of any request validly submitted.

4 How you can exercise your rights

If you wish to exercise any of the rights described in Section 3, please contact us at the contact details provided in Section 7 or via the inquiry form linked below.

[Inquiry Form About Personal Information](#)

4.1 Authorized agents

If you are authorized to exercise the rights described in Section 3 on behalf of an individual, please reach out to us via the inquiry form and indicate that you are an authorized agent. We will provide you with instructions on how to submit a request as an authorized agent on behalf of an individual.

4.2 Verifying your requests

Please bear in mind that to evaluate your rights requests, we need to be sure it is you who made the request. We will verify your identity via the following methods:

- We will send you an email requesting that you confirm certain Personal Information that we have in our Recorded Images.

To carry out the verification, we may ask you for information you provided to us previously, such as your contact number, email address, date of birth, or the date that you last received a communication from us.

5 Security control measures concerning Personal Information which we process

We shall take reasonable security control measures designed for the prevention of leakage, loss or falsification of Personal Information which we collect, as well as take proper management. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

6 Updates to this Policy

We shall review this Policy from time to time in order to maintain the appropriate processing of Personal Information. We may change the contents of this Policy, system and operation method at any time without obtaining prior consent, except as required by laws and regulations. If we change this policy, we will post the changed policy in a place we deem appropriate in this policy and on our website.

7 International data transfer

We are headquartered in Japan and may use service providers that operate in other countries.

8 For inquiries about this Policy and processing of Personal Information

For inquiries about the requests described in Section 3 above or this page, please fill out the inquiry form in the linked page below.

[Inquiry About Personal Information Protection](#)