

Privacy Policy

Pioneer, together with the Pioneer Group (as defined below under Section 1), has set its Group Philosophy “Move the Heart and Touch the Soul” and its Group Vision “Creating the Future of Mobility Experiences,” and offers you the services provided by ZenVue.

This Privacy Policy hereinafter shall be referred to as “**Policy**.” In this Policy, the following words shall have the following meanings:

- “**ZenVue**” is the drive recorder app from Pioneer known as the “Pioneer Drive Recorder App”.
- “**Services**” is ZenVue and the other applications associated with our Products.
- “**Products**” is a dashcam called Pioneer Dash Cameras which is sold by Pioneer.

This Policy, including “**Appendix A**,” explains how the Pioneer Group collects, uses or shares your personal information and protects your privacy upon your use of the Services, as well as other related matters.

This Policy applies to the use of the Services only, and not any other service. If you use any other application or service of the Pioneer Group, or any application, website or service that contains any hyperlink to another privacy policy, the privacy policy for such application or service, or such hyperlinked privacy policy will apply.

Please click the following links to see the respective sections of this Policy.

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1. Identity of Controller

As for the Services, the following companies from the Pioneer Group process your personal information. The company who controls your personal information (“**controller**”) will differ depending on the place where you reside.

Pioneer India Electronics Private Limited processes your personal information as the controller.

Pioneer India Electronics Private Limited (“**Pioneer**”)
Unit no. 3, 10th floor, Ambience Corporate Tower II, Plot no. 3 Ambience Island, NH-8,
Gurgaon-122002.

Pioneer is a stock company established under the laws of India. The address of its headquarters, name of its representative and other information can be found at the below links.

The group companies of Pioneer are as listed at the following link in this Policy, Pioneer and its relevant group companies hereinafter referred to as the “**Pioneer Group**”.

<https://global.pioneer/en/corp/group/>

This Policy specifically provides for the purposes of processing of personal information and other matters in relation to the Services pursuant to the Privacy Policy established by Pioneer. Please see Pioneer’s Privacy Policy as well.

<https://pioneer-india.in/privacy-policy/>

<https://global.pioneer/en/privacy/>

2. Categories of Personal Information, Purposes of Processing and Legal Basis

The following subsections describe what personal information Pioneer processes, as well as the purpose and legal basis for such processing.

When you use the Service, Pioneer processes the information categorized in (i) below, for the purposes described in (ii) below.

(i) *Categories of information*

- (a) When you use the Service, it will collect the following information. These types of information are stored in your terminal devices such as a smartphone where ZenVue is installed and will not be sent to Pioneer.

- 1) Your login information and registration information such as Wi-Fi password
 - 2) Videos or images recorded by the Product
 - 3) Serial number of the in-vehicle device
- (b) When you use the Service, it will collect the following information. Such information will be stored in your terminal devices such as a smartphone where ZenVue is installed and will also be sent to Pioneer.
- 1) information about the individual identification information concerning each in-vehicle device (such as product model number, and firmware version of the in-vehicle device), and information concerning the smart device (such as a smartphone or tablet) that you use
 - 2) information collected by website/application analysis services provided by third parties set forth in Section 3 below
- (c) When you contact Pioneer about the Services and the Products, Pioneer will collect the following information.
- 1) Information on customer service and other related correspondences
 - 2) With respect to ZenVue, the usage status thereof, etc. the operation history thereof, details of settings you set, content or sources used, and screens displayed
- (ii) *Purposes and the legal grounds*
- 1) providing you with various functions contained in the Service (including responding to your inquiries about various services as well as your requests for repair and after-sale services, processing various orders, etc. from you, and performing relevant obligations), and maintaining such functions; the legal basis therefor is the performance of contracts with you.
 - 2) maintaining and improving the safety and security of the Service, as well as complying with and performing this Policy and any applicable laws; the legal basis therefor is the compliance with applicable laws and regulations, and our legitimate interest in the provision of high-quality services in compliance with various relevant rules.
 - 3) contacting you and providing you with information; the legal basis therefor is your consent (for the avoidance of doubt, we do not have your contact information, therefore such contact may not happen except where you make inquiries).
 - 4) solving operational issues and problems concerning the Service or Pioneer's products related thereto, including preparing statistical information; the legal basis therefor is Pioneer's legitimate interest in the provision of high-quality services.
 - 5) planning, development, analysis, research, study, evaluation, enhancement and improvement of Pioneer's products or services, including preparation of statistical

information; the legal basis therefor is Pioneer's legitimate interest in the provision of high-quality services.

3. Collection of Information from Third Parties

Pioneer may collect information described in 2(i)(b) by using website/application analysis services provided by third parties.

4. Use of Online Services and Functions Provided by Third Parties and Third Party Website Links and Services

We may provide links to some external third-party websites. The provision of any such link does not constitute the promotion or endorsement of the external website or the product and services offered by it.

The services provided by such third-party service providers are operated independently from Pioneer. As such third parties collect personal information that is necessary for them to provide their services, such third parties' privacy policies will apply as well. When you use such services, please be sure to consult the third parties' policies.

5. Recipients and Sharing of Personal Information

Pioneer shares the information set forth in Section 2(i)(b)(c) with the following recipients, in order to achieve the purposes described in Section 2(ii).

(a) Companies that belong to the Pioneer Group

The group companies of Pioneer are as listed at the following link. When Pioneer uses personal information jointly with any of the group companies for the purposes of processing described in this Policy, Pioneer imposes the obligation upon such group company to comply with this Policy or protective conditions equivalent to or stricter than those set forth herein. Pioneer is responsible for such use.

<https://global.pioneer/en/corp/group/>

(b) Service providers

Pioneer may disclose personal information to service providers with which Pioneer collaborates, such as providers for hosting servers, providers of technical support for the system, and providers for management and operation of the Services. Furthermore, this may include service providers appointed by Pioneer to the extent necessary for improvement and research/development of Pioneer's products or services. Service providers are obligated to keep your information confidential and secure and use the information only for the purposes specified by Pioneer.

(c) Third-party service providers

As described above in Section 4, you can use third parties' linked applications through Pioneer's applications and link the services or websites of mobile applications of Pioneer to third parties' online services. Such third-party service providers collect your personal information that is necessary for them to provide their services.

- (d) Companies with which Pioneer collaborates for developing new services, etc.

Pioneer may, in collaboration with other companies, develop new products and services, or improve its existing products and services. Analysis data of the Service may be shared in such collaborative work. Such data will be anonymized or statisticized by Pioneer. Pioneer will not provide those collaborating companies with any information that can identify you or your smart device.

- (e) Law enforcement agencies, legal proceedings, corporate reorganization and other matters

Pioneer may disclose your personal information to law enforcement agencies or other information recipients as Pioneer reasonably deems appropriate, in the cases where: (1) Pioneer is complying or abiding with applicable laws and regulations or legal proceedings (such as a court order or subpoena); (2) such disclosure of information is necessary for defense of rights of users, other persons or Pioneer; (3) Pioneer is confirming, establishing, exercising or protecting its legal rights; or (4) Pioneer has obtained the consent of users (which may be revoked at any time by the user).

- (f) Business transfer and organizational change

Pioneer may disclose personal information in case it transfers all or part of its business or assets or causes the same to be succeeded (including by merger, acquisition, joint venture, reorganization, company split, dissolution and liquidation). Pioneer retains the right to transfer personal information in such instances.

6. Cookies and Other Tracking Technologies

Our service providers (Section 5(b)) and third-party service providers (Section 5(c)) may utilize cookies, device identifiers, and pixels. When using cookies and other tracking technologies such as those by analytics partners, they may be deployed for the delivery of the application.

7. International Data Transfer

As described in Section (2), ZenVue will send the information listed in Sections 2(i)(b) and (c) to Pioneer. Other information including Wi-Fi password and videos and images recorded by the Product will not be sent to Pioneer. As a result, some types of information may be processed outside the country where you live. We have put in place adequate measures to protect your information, such as organizational and legal measures.

8. Storage of Personal Information and Security Control Measures

- (a) Retention of personal information

Pioneer will retain the information described in Sections 2(i)(b) and (c) until the purpose of handling the information as described in Section 2 is achieved. The criteria used to determine the retention period include: (i) the duration of our ongoing relationship with you, (ii) whether we have any applicable legal obligations, and (iii) whether it is necessary for the performance of the contract that you are a party to.

(b) Security Control Measures

Pioneer takes the necessary security control measures to prevent leakage, etc. of such information, by implementing various information security measures such as development and improvement of the information protection system, educational/awareness-raising activities for employees, management of entrance and exit to and from the area where personal information is processed and control of access to personal information, and introduction of anti-virus software.

Furthermore, Pioneer will continuously maintain and improve its information protection system to ensure that necessary departments within Pioneer, which are involved in providing services, appropriately implement safety management measures as part of the development of products and services.

When Pioneer provides personal information concerning the Services to recipients, Pioneer will request such recipients to take appropriate security control measures.

Personal information subject to the Policy is stored in the cloud services of the following service providers. The name of the main service providers, name of their services, country where the personal information is stored, and personal information protection measures taken by such service providers are as follows:

Amazon Web Services, Inc./AWS

- Location of head office: The United States of America
410 Terry Ave N Seattle, WA, 98109-5210, the United States of America
- For further information concerning personal information protection measures taken by this service provider, please refer to the following website:
<https://aws.amazon.com/jp/compliance/programs/>
- Country where the server storing personal information is located: India (region)

9. Your Rights Regarding the Processing of Your Personal Information

You may have certain rights regarding your personal information. Those rights include, but are not limited to, the right of access, the right to rectification, and right to erasure. Pioneer will appropriately respond to such requests from you for the exercise of rights in accordance with applicable laws and regulations.

The laws and regulations of each country in which you reside may grant you rights to your

personal information. For more information on your rights, see Appendix A on privacy rights and exercise procedures.

When exercising your rights, we may ask for information about Pioneer products and apps as well as a copy of your identification documents to verify your identity during the process. For inquiries about your rights, how to exercise them, and other enquiries regarding this Policy, please refer to Section 9.

You may have the right to lodge a complaint to the personal information supervisory institutions where you reside. The examples of such are listed in Appendix A as reference information.

10. Contact Details and Information

By email at: privacysupport@pioneer.com.sg

By letter to: Pioneer Electronics Australia, Unit 13, 153-155 Rooks Rd, Vermont, 3133, Victoria, Australia

Note: For inquiries about the Product, please contact the sales company managing each country.

<https://global.pioneer/en/corp/group/>

11. Automated Decision-Making (including profiling)

You have the right not to be subject to a decision based solely on an algorithm or other automated processing, including profiling, that produces legal effects for you or may significantly affect you.

12. Information Concerning Children

The Services to which the Policy applies are intended for use by users who are adults or who satisfy the qualifications for driving an automobile or the like, such as an age requirement, in the countries where they reside. Accordingly, this Policy applies to the users who satisfy such qualifications (including users who purchase the Product and use ZenVue to support drivers). The Services are not intended for use by children.

Pioneer will not knowingly collect online personal information from children under the age of 16.

“**Child/children**” used herein includes children under the age of 16. The age requirement to be treated as a child may differ depending on the country where the children reside. Children may be granted the right to withdraw or revoke their consent, or request deletion of their personal information, through persons with parental authority, guardians, etc. or other lawful agents of the relevant children, under the laws and regulations of the relevant country. Please contact the relevant point of contact described in Section 9 to exercise these rights or make inquiries.

13. Amendment to This Privacy Policy

This Privacy Policy may be amended from time to time in accordance with the business circumstances of Pioneer. Any amendment to this Privacy Policy will be posted or displayed on the websites or applications of Pioneer and become effective on the effective date or notification date thereof.

Appendix A

We will list supervisory authorities related to personal information in various countries as examples. If you have any questions, please contact the relevant point of contact described in Section 9.

1. For those residing in Singapore, the following applies to you.

You have rights regarding the information we store under the Personal Data Protection Act. You can also lodge a complaint with the Personal Data Protection Commission.

For more information, please visit:

<https://www.pdpc.gov.sg/contact-us>

2. For those residing in Australia, the following applies to you.

You have rights regarding the information we store under the Privacy Act 1988. You can also lodge a complaint with the Office of the Australian Information Commissioner.

For more information, please visit:

<https://www.oaic.gov.au/privacy/privacy-complaints/>.

End.

* Trademarks, etc.

The names and logos used in this applications or website or may be used as trademarks belonging to other companies.

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