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# Privacy Policy

Standard for processing personal data at CEVT or on behalf of CEVT

## Record of Changes

| Date | Section | Description of update/change | Posted by |
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## BACKGROUND

Every individual is entitled to protection of their personal integrity, which includes a number of rights and freedoms determined in various legal acts. The right to protect the integrity of personal information is generally referred to as the right to data privacy. Each individual's right to data privacy is secured through a rigorous legal framework of rules and principles applicable throughout the entire lifecycle of the personal information; from collection of personal information to erasure of the personal information. Moreover, the legal framework protects and ensures certain rights granted to individuals so that the individual is in control of his or her personal information and that any measures taken with personal information is conducted in a transparent manner.

It is crucial to CEVT that its business is conducted in an honest and transparent manner with high ethical standards. As regards data privacy, it is of utmost importance to CEVT that anyone whose Personal Data CEVT Processes in any way can be reassured with the knowledge that CEVT Processes the Personal Data with a high standard of care and protection.

The purpose of this Privacy Policy is to outline CEVT's expectations from employees, stakeholders and other persons that may Process Personal Data for or on behalf of CEVT. Moreover, this Privacy Policy describes how CEVT protects and maintains the fundamental rights and freedoms pertaining to data privacy.

## DEFINITIONS

The following terms used in this Privacy Policy shall have the meanings set forth below.

**"Personal Data"** means any information relating to an identified or identifiable natural person.

**"Data Subject"** means an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as name, and identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**"Processing"** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as (without limitation) collection, recording, organization, structuring, storage, adaption or

alteration, retrieval, consultation, usage, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"Data Controller"**

means the natural or legal person which determines the purposes and means of the Processing of Personal Data.

**"Data Processor"**

means a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of the Data Controller.

**"Sensitive Data"**

means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**"CEVT"**

means China Euro Vehicle Technology AB, reg. no. 556922-7639.

## 1. SCOPE AND PURPOSE OF THE DATA PRIVACY POLICY

This Privacy Policy applies whenever CEVT Processes Personal Data. Applicable data protection legislation in each country where CEVT operates shall be complied with at all times.

It is not the intention that this Privacy Policy merely shall reproduce what is already stated in applicable legislation and compliance with this Privacy Policy does not in itself imply compliance with applicable data protection legislation. Instead, this Privacy Policy aims to set forth a supplementary framework to the applicable data protection legislation in each jurisdiction where CEVT operates. In the event of discrepancy or inconsistency between this Privacy Policy and the applicable legislation, the applicable legislation shall prevail. However, if this Privacy Policy provides for a higher standard of protection for Personal Data and the rights and freedoms of the individuals whose Personal Data CEVT Processes than the applicable legislation, then the provisions herein regarding protection of Personal Data shall prevail, unless applicable legislation provides otherwise.

## 2. FUNDAMENTAL PRINCIPLES FOR PROCESSING OF PERSONAL DATA

### 2.1. Legality

CEVT shall Process Personal Data in a lawful, fair and transparent manner and shall always comply with applicable data protection legislation, as well as any potential guidelines from relevant supervisory authorities.

### 2.2. Purpose Limitation

Personal Data shall only be Processed for clearly specified and documented purposes and CEVT shall not Process Personal Data for any purposes incompatible with the purposes for which the Personal Data was originally collected, unless applicable legislation permits such processing.

### 2.3. Data Minimization

CEVT shall Process Personal Data in accordance with the principle of data minimization. This entails that CEVT only shall Process such Personal Data that is necessary in order to fulfil the purposes for which the Personal Data was collected.

To ensure compliance with the principle of data minimization, it is key that Personal Data is Processed on a *need-to-have* basis, rather than on a *nice-to-have* basis.

### 2.4. Accuracy of the Personal Data

CEVT shall take appropriate measures to ensure that Personal Data Processed by CEVT is accurate, complete and, where necessary, up to date. This includes that CEVT shall have routines in place in order to ensure the accuracy of the Personal Data Processed. In the event CEVT Processes inadequate or inaccurate Personal Data, such Personal Data shall be rectified or erased without any undue delay.

### 2.5. Security

CEVT shall take appropriate technical and organizational measures to ensure that the Personal Data is protected and otherwise Processed in a secure manner. Only systems that can ensure an appropriate level of protection of the Personal Data may be used by CEVT for Processing of Personal Data.

Secure Processing entails that the Personal Data shall be kept confidential and protected against any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to the Personal Data.

### 2.6. Transparency

CEVT shall always Process Personal Data in a transparent manner in relation to the Data Subject. This shall be ensured by, among others, intelligible and unambiguous information notices and policies, openness regarding the Processing and measures to facilitate a Data Subject's request to exercise his or her rights in relation to the Processing of Personal Data (such as e.g. the right to access).

## 2.7. Accountability

When acting as a Data Controller, CEVT shall always be able to demonstrate its compliance with applicable regulations relating to Processing of Personal Data. This includes e.g. that CEVT always shall be able to demonstrate CEVT's compliance with the fundamental principles of Processing, that there is a legal basis for the Processing, and that appropriate technical and organizational measures have been taken to ensure that the Personal Data is protected.

An essential step in this context is to keep and continuously update documentation that describes the steps taken to ensure compliance with applicable legislation including the fundamental principles of Processing of Personal Data. This entails keeping internal records of the various Processing activities carried out by CEVT.

## 3. LEGAL GROUNDS FOR PROCESSING OF PERSONAL DATA

### 3.1. Consent

CEVT may Process Personal Data on the basis of the Data Subject's consent to the Processing. However, CEVT shall only rely on consent as a legal basis for the Processing of Personal Data if there are no other legal grounds available for the particular Processing activity.

In order to be valid, a consent shall be unambiguous and freely given by the Data Subject, on the basis of correct information so that the Data Subject has been able to understand the extent of the consent. If consent is given for separate purposes, the Data Subject shall also be able to choose for which purposes his or her Personal Data shall be Processed, i.e. one consent may not cover several purposes.

Furthermore, the Data Subject shall always be able to revoke his or her consent at any time without any negative impact on the Data Subject and it shall be as easy to revoke the consent as to give the consent.

Consent may not be used as a legal ground for Processing of employees' Personal Data or other Data Subject's Personal Data where there is a clear imbalance between the individual and CEVT, unless applicable legislation provides otherwise.

### 3.2. Performance or Execution of a Contract

CEVT may Process Personal Data if the Processing is necessary for the performance or execution of a contract with the Data Subject. It should in this context be noted that this legal ground only comprises contracts with the Data Subject and not the performance or execution of contracts in general.

### 3.3. Compliance with a Legal Obligation

CEVT may Process Personal Data if the Processing is necessary in order to comply with a legal obligation to which CEVT is subject.

### **3.4. Balance of Interests**

CEVT may Process Personal Data if CEVT has a legitimate interest to Process the Personal Data and such interest overrides the Data Subject's interest in protecting the privacy of his or her Personal Data. Within the scope of the right to receive information according to section 5.1 below, CEVT shall inform the Data Subject about the legitimate interest that CEVT deems to override the Data Subject's privacy interest.

If a Data Subject exercises his or her right to object to the Processing based on a balance of interests, CEVT must demonstrate a compelling legitimate interest in order for the Processing of the particular Data Subject's Personal Data to be lawful on the basis of a balance of interests. If not, the particular Processing activity must cease, unless CEVT can rely on another legal ground.

### **3.5. Processing of Sensitive Data**

Sensitive Data may not be Processed, unless the Data Subject's has given his or her consent or the Processing otherwise is explicitly authorized under applicable legislation. Sensitive Data pertaining to employees at CEVT may be Processed in order to fulfil employment obligations to which CEVT is subject, e.g. in order to calculate the salary with regard to sick days, without the employees' consent.

### **3.6. Personal Data relating to Criminal Offences**

Unless explicitly authorized by applicable legislation, CEVT shall not Process Personal Data relating to criminal offences.

## **4. SECURITY AND INCIDENT MANAGEMENT**

### **4.1. Technical and Organizational Measures**

CEVT shall take technical and organizational measures to protect the Personal Data from unlawful or accidental loss, destruction or alteration, and from unauthorized or unlawful access. The security measures shall be appropriate having regard to the certain risks that are connected to the particular Processing activity, as well as the level of sensitivity of the Personal Data that is Processed. For example, Sensitive Data requires that CEVT implements more robust security measures and control mechanisms than in relation to Personal Data in general.

### **4.2. Privacy by Design**

Any system that is Processing Personal Data shall be designed to facilitate compliance with the fundamental rights and freedoms of the Data Subject and ensure that the Personal Data is Processed in a secure and lawful manner. For example, if directly identifiable parameters (such as e.g. social security numbers) are unnecessary in order to achieve the purposes of the Processing, such directly identifiable parameters shall be pseudonymized. Moreover, systems shall be designed to observe and comply with the fundamental principles of Processing of Personal Data by default.

This may include e.g. system functions to ensure that the data minimization principle is adhered to and that free text fields are only available when strictly necessary.

### **4.3. Incident Management**

In the event of an incident which leads to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data, CEVT shall immediately upon becoming aware of the incident, investigate the incident and its potential consequences. Unless it is unlikely that the incident poses a risk to the rights and freedoms of the Data Subjects, CEVT shall notify the supervisory authority about the incident within no later than 72 hours from when CEVT became aware of the incident. If the incident poses a significant risk to the Data Subject's integrity, CEVT shall also notify the Data Subjects about the incident.

Information security is important to CEVT and in the event of a security incident CEVT shall take measures to investigate the circumstances behind the incident and also take measures to rectify the potential negative impacts of the incident, as well as to ensure that a similar incident will not be repeated in the future.

## **5. RIGHTS OF THE DATA SUBJECTS**

As an important step in CEVT's ambition to Process Personal Data with a high standard of protection and in compliance with applicable legislation, CEVT shall at all times observe the various rights that are afforded to the Data Subjects under applicable legislation. Thus, CEVT shall take measures to, at a minimum, be able to respond to requests from Data Subjects regarding the exercise of the following rights. This includes that CEVT shall take both technical and organizational measures in order to ensure that there are routines in place to manage requests from the Data Subjects.

### **5.1. Right to Receive Information**

CEVT shall take appropriate measures to provide information to the Data Subjects about the Processing of the Data Subjects' Personal Data. The information shall always be presented to the Data Subject in an intelligible manner and with a plain language. CEVT shall at all times comply with the information requirements set out in the applicable legislation.

Providing Data Subjects with information regarding the Processing is an important step to ensure transparency in relation to the Processing of Personal Data. Hence, it is of importance to CEVT that the Data Subjects receive correct information regarding the Processing and that the information covers all Processing activities that a particular Data Subject is subject to.

### **5.2. Right to Access**

The Data Subjects are entitled to information and access to the Personal Data that CEVT Processes about them. Upon request and to the extent required under applicable legislation, CEVT shall provide the Data Subject with an electronic copy



of the Personal Data that CEVT Processes about the Data Subject. Such electronic copy shall be provided to the Data Subject in a commonly used format.

If the Data Subject requests more than one copy of his or her Personal Data, CEVT shall, if permissible under applicable legislation, be entitled to charge a reasonable fee for the administrative costs connected with the provision of the electronic copy.

### **5.3. Right to Rectification**

The Data Subjects shall be able to request rectification of any inaccurate or incomplete Personal Data that CEVT Processes about them. Accordingly, CEVT shall have routines that enable such rectification.

### **5.4. Right to Erasure**

The Data Subjects are entitled to request erasure of their Personal Data if one of the following circumstances are applicable:

- (i) the Personal Data are no longer necessary for the purposes for which they were collected;
- (ii) the Data Subject withdraws his or her consent and CEVT has no other legal ground for the Processing;
- (iii) the Data Subject objects to the legitimate interest of the Processing and CEVT has no compelling legitimate interest which overrides the Data Subject's privacy interest;
- (iv) the Personal Data have been Processed unlawfully;
- (v) a legal obligation requires erasure of the Personal Data;
- (vi) the Personal Data have been collected from children within the scope of an offer of information society services; or
- (vii) the Data Subject otherwise has a right to request erasure under applicable legislation.

CEVT shall without undue delay upon receiving a request for erasure, investigate whether any of the abovementioned circumstances apply and thereafter either erase the Personal Data or notify the Data Subject if CEVT deems that the right to erasure does not apply.

### **5.5. Right to Restriction**

The Data Subject shall under certain circumstances have the right to request restriction of the Processing of their Personal Data. This means that it shall be technically possible for CEVT to mark or flag Personal Data as restricted in order to ensure that the Personal Data is not Processed further (other than being stored in CEVT's systems), unless the Data Subject gives his or her consent to such further Processing.

CEVT shall always inform the Data Subjects of any adverse effects that may arise as a consequence of exercising the right to restriction.

## 5.6. Right to Data Portability

If the Personal Data is Processed by automated means, if the Data Subject has provided the Personal Data to CEVT and if the legal ground for the Processing is either (i) the Data Subject's consent, or (ii) that the Processing is necessary for the performance or execution of a contract with the Data Subject, then the Data Subject is entitled to receive his or her Personal Data in a structured, commonly used machine-readable format.

Moreover, the Data Subject shall be entitled to transmit the Personal Data to another Data Controller and if it is technically feasible, the Data Subject may request that CEVT shall transmit the Personal Data directly to another Data Controller.

## 5.7. Right to Object

The Data Subject shall have the right to object to the Processing of their Personal Data if the Processing is based on a balance of interests or if the Personal Data is Processed for direct marketing purposes.

If the Data Subject objects to Processing based on a balance of interests, CEVT shall demonstrate to the Data Subject that CEVT has a compelling legitimate interest to Process the Personal Data without regard to the objection. If CEVT lacks such compelling legitimate interest, the Processing must cease and the Data Subject shall be entitled to exercise his or her right to erasure, unless CEVT can rely on another legal ground for the Processing of Personal Data.

## 6. DATA TRANSFERS

### 6.1. Intra-Group Transfers

Personal Data may be transferred from CEVT to another group company, which may or may not include transfers between different jurisdictions and/or transfers outside the EU/EEA.

CEVT shall always ensure that such intra-group transfers comply with applicable legislation. To ensure compliance with applicable legislation, CEVT shall procure that the transfer is subject to adequate safeguards, such as e.g. an intra-group data transfer agreement.

### 6.2. External Transfers to Data Controllers

Before any Personal Data is transferred to external parties outside CEVT to an external party acting as Data Controller, CEVT shall investigate whether the receiving Data Controller complies with the applicable legislation in the country where the receiving Data Controller is located and only transfer the Personal Data if the receiving Data Controller complies with applicable legislation. The receiving Data Controller shall enter into an agreement with CEVT, ensuring that the Data Controller will comply with the applicable legislation with respect to protection of Personal Data.

### **6.3. External Transfers to Data Processors**

CEVT assigns third party service providers in several instances. A substantial proportion of the third party service providers will, directly or indirectly, Process Personal Data on behalf of CEVT, in which case such service provider acts as Data Processor in relation to CEVT. CEVT shall only assign Data Processors that provide CEVT with sufficient guarantees that the Data Processor will comply with applicable legislation.

To ensure compliance with applicable legislation, CEVT shall always enter into a data processing agreement with any Data Processor that will Process Personal Data on behalf of CEVT. To the extent possible, CEVT shall use its own template for Data Processing Agreements, as this template has been reviewed to comply with the requirements of applicable legislation.

### **6.4. Transfers outside EU/EEA**

When CEVT transfers Personal Data from the EU/EEA to a country outside the EU/EEA, CEVT shall ensure that the requirements set out in applicable legislations are observed so that the transfer is lawful. This includes, among others, ensuring an adequate level of protection by means of entering into the EU Commission's Standard Contractual Clauses (or similar framework applicable from time to time) with the receiving entity (data importer).

## **7. CEVT ACTING AS DATA PROCESSOR**

In the event CEVT Processes Personal Data on behalf of an external third party or on behalf of another group company as a Data Processor, CEVT shall always Process the Personal Data in accordance with the applicable legislation and the Data Controller's lawful instructions.

CEVT sets high requirements on CEVT's Processing of Personal Data as Data Processor. This entails that CEVT shall Process the Personal Data with the same standard of care and level of protection as provided for in this Privacy Policy.

## **8. COMPLIANCE AND GOVERNANCE**

CEVT shall have internal procedures to ensure compliance with this Privacy Policy as well as applicable legislation.

CEVT shall ensure that all relevant employees of CEVT are aware of the importance of protection of Personal Data and shall thus develop training and awareness programs, e.g. e-learning, where the employees are trained in data privacy related matters. Training of newly hired personnel shall be a part of the introduction process. CEVT will document successful participation in training sessions, which each respective employee has undergone, so that CEVT is able to demonstrate that CEVT's employees possesses general knowledge and awareness of data privacy and the protection of Personal Data.

Moreover, employees at CEVT shall keep themselves updated on any and all policies and guidelines relating to Processing of Personal Data, as amended from time to time.

## 9. EXCEPTIONS

Any exception to this policy must be requested on a case-by-case basis and be approved in writing by the CEVT Legal VP in advance.

## 10. REPORTING

Any discovered deficiencies from this policy, should be reported to the immediate management as well as to the CEVT Compliance Manager.