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Subject: Privacy Policy		Classification: Company Wide

**Related Regulations:** [Selected Regulations]

**Locations:** TNAM - MIO

## DENSO TEN AMERICA LIMITED'S PRIVACY POLICY

### 1. OVERVIEW

This privacy policy (this “Policy”) applies to DENSO TEN AMERICA Limited (“we,” “us,” or “our”). We strive to deliver outstanding products and services and value our customers’ business and loyalty. We have developed this Policy to explain our practices regarding the personal information we collect from you or about you when you use this website, communicate with us verbally or in writing, or otherwise in connection with our products and services (collectively, the Services”). If you are a resident of California, please click here for [California Privacy Policy Rights Notice .DOCX](#) for additional information regarding your rights under California law.

**By accessing or using our Services or submitting information to us, or otherwise agreeing to this Policy, e.g., in the context of registering for or purchasing any of our Services, you understand and consent to our collection and use of your personal information as described in this Policy.**

### 2. PERSONAL INFORMATION WE COLLECT AND USE

Personal information is information that identifies, relates to or describes you or can reasonably be associated with or linked to you. Personal information does not include information that has been de-identified or aggregated (“Anonymized Data”) such that it can no longer be used to identify you. This notice does not apply to Anonymized Data. We may use Anonymized data for any lawful purpose.

We collect and use personal information in certain common cases, including the following:

- 2.1 **Contact Us.** In connection with your inquiry to us through the Contact Us feature on our website; we collect personal information. The information we collect in these cases may include first name, last name; country; address; phone; fax; email address; company; department; category of inquiry (Aftermarket products, Recruitment, Corporate Information, Media and Public Relations); subject of inquiry; and inquiry message. We use this information to understand and respond to your inquiry. The personal information described in this paragraph is the “Inquiry Data.”
- 2.2 **Customer Service.** We may provide customer service at our facilities, at our customer’s facilities, by telephone and through our website. In providing customer service we may collect personal information from you such as name, address, e-mail address, telephone, product purchases, product sales, and other information related to your service request. We use this information in order to investigate,

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resolve and respond to your customer service issue. The personal information described in this paragraph is the "Customer Service Data."

- 2.3 **Social Media.** If you choose to participate in one of our sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates, and friends list. We may also allow you to enter into contests to provide photos, such as of products you have purchased, which you may share with your connections on social media for votes, shared offers or other promotions. We use this information for providing information about our goods and services and for understanding the needs and preferences of our customers. The personal information described in this paragraph is the "Social Data."
- 2.4 **Warranty Program.** We may collect personal information in the course of our administration of warranties; and recalls. We typically receive this personal information from our Commercial Customers to administer such requests. The personal information we may receive in these cases includes your name and address and may include other personal information. The personal information described in this paragraph is "Warranty Data."
- 2.5 **Vehicle Systems Testing.** We regularly test technologies to improve vehicle safety, reliability, efficiency, and convenience. These technologies include, but are not limited to, systems designed to facilitate automated, connected, and eco-friendly driving. The personal information we collect in these cases is referred to as "Testing Data" and includes field test video from onboard cameras.
- 2.6 **Vehicle Diagnostic Systems.** We provide technologies to perform vehicle diagnostics using information stored in a vehicle's internal computer systems. The personal information we collect in these cases includes name; address; application defined vehicle identifier; application metadata, settings, and version; authentication source; browser type; company name; dealer fax number, location, and phone number; diagnostic interface type and version; distributor name; document identifier; email address; IP address; location; model, network carrier, operating systems, screen size, and type; name; payment method; phone number; product used; metadata, identification number, and user defined identifiers; request identifier, metadata, and status; residential address; shipping information, name, recipient company, and address; opt-out date, opt-out status, vehicle identification number, We use this information ("VDS Data") to provide our vehicle diagnostic services.
- 2.7 **Security.** Our facilities use security cameras to monitor the activity of our visitors and staff. The information we collect includes video recordings. Audio is not recorded. The camera images may be monitored in real time. The recordings are viewed if there is reason to believe that there has been a breach of security. We use this information to detect security incidents and to report to law enforcement

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agencies. The personal information described in this paragraph is the "Security Data."

- 2.8 **Automatically Collected Personal Information.** By its nature, our websites and apps also automatically collect some personal information about you. In order for you to view or interact with our website or apps, we receive individual identifiers like your IP address, and some network information like the date and time that pages are visited. We may collect this personal information even if you are not logged in. We collect some personal information automatically using cookies or other tracking technologies as described below in Section 7. The personal information automatically collected may be collected by or on behalf of third parties who may provide us with inferences or aggregate reporting based on analysis of such personal information. We use this information to understand how our customers are using our websites and apps. The personal information described in this paragraph is the "Use Data."
- 2.9 **Employees.** We collect personal information in the context of your role as an applicant to, an employee of, director of, or officer of our business. The personal information we collect in these cases may include your name, social security number, address, date of birth, gender, race, ethnicity, bank account and routing number, tax filing status, emergency contact information, telephone number, family member names, educational background, criminal background and employment history, medical provider information, dependent name(s), date of birth, gender and address, medical insurance provider, compensation and benefits data, workplace, and title. We only use this information for purposes of evaluating qualifications related to your job application or your job duties; evaluating your performance; or for providing compensation, benefits and services in the context of the employment relationship. The personal information described in this paragraph is the "Employee Data."
- 2.10 **Individuals Representing Businesses.** We collect personal information in the context of your role as a representative of a business. The personal information we collect in these cases may include your name, address, email address, telephone, date of birth, gender, social security number and personal financial information. We use this information for communicating with you in your role as a representative of a business or if you are an owner of a business to evaluate your creditworthiness. The personal information described in this paragraph is the "Biz Rep Data."

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from other information we collect.

### **3. SOURCES FROM WHICH WE COLLECT PERSONAL INFORMATION**

We may collect personal information about you from a number of sources in addition to those means of collection indicated above, including offline or through sources unrelated to your use of

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our websites. For example, we may collect personal information from publicly accessible sources (e.g., property records); directly from a third-party service provider, (e.g., credit reporting agencies or customer due diligence providers); or from other third parties with your consent (e.g., your bank). We may merge or co-mingle that personal information with the personal information we maintain about you and other data collected on or through our website. Categories of sources from which we may collect personal information include advertising networks; internet service providers; data analytics providers; government entities; operating systems and platforms; and social networks

#### **4. PURPOSES FOR WHICH WE COLLECT PERSONAL INFORMATION**

In addition to the purposes set forth in Section 2 above, we may collect your personal information for the following purposes:

- 4.1 **Auditing**. Auditing related to a current interaction with you, including, but not limited to, auditing compliance with this specification and other standards;
- 4.2 **Security**. Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
- 4.3 **Debugging**. Debugging to identify and repair errors that impair existing intended functionality;
- 4.4 **Transient Use**. Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with us provided that your personal information is not disclosed to a third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us;
- 4.5 **Services**. Performing and improving the Services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing analytic services, providing storage or providing similar services on our behalf.
- 4.6 **Advertising**. Providing advertising and marketing services to you;
- 4.7 **Research and Surveys**. Undertaking internal research for technological development and demonstration, administering internal and external surveys, including surveys submitted by current, former, or prospective customers and shared with our partners, affiliates, and contractors.
- 4.8 **Quality and Safety**. Undertaking activities to verify or maintain the quality or safety of our products and services and to improve, upgrade, or enhance our products and services.

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## 5. LIMITED USE OF PERSONAL INFORMATION

We will only use your personal information for the purposes for which we have collected it, unless we reasonably determine we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to receive an explanation as to how the processing for a particular purpose is compatible with the original purpose, please contact us via the information specified in the Contact section below.

## 6. OUR DISCLOSURE OF PERSONAL INFORMATION

In order to provide you with the best products and services, we may disclose your personal information to our affiliates, service providers, contractors and other third parties as described below.

- 6.1 **Affiliates.** We may disclose your personal information to our parent company and entities under shared corporate control ("Affiliates") for the purposes described in Sections 2 and 4 above.
- 6.2 **Commercial Customers.** We supply services and products to major automakers and other commercial customers. We may share your personal information with automakers and customers that offer their own consumer services and products. For the purposes of this Statement, these are our "Commercial Customers."
- 6.3 **Contractors.** We disclose personal information to entities that help us fulfill a business or commercial purpose including, but not limited to, shipping companies that deliver our products to you ("Contractors"). Contractors are not permitted to sell or share your personal information or to use your personal information other than to perform the tasks we assign to them.
- 6.4 **Service Providers.** We disclose your personal information to companies that process personal information on our behalf for a business or commercial purpose, including, but not limited to, website hosting, app design, database management, web analytics, app analytics, billing, payment processing, and communicating with you about our products or services ("Service Providers"). Service Providers are not permitted to sell or share your personal information or to use your personal information other than to perform the tasks we assign to them.
- 6.5 **Third Parties.** In addition to third parties in the foregoing categories, we may disclose personal information to the following categories of third parties: advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, social networks and data brokers. For the purposes of this Policy, "third party" or "third parties" are entities that may sell, retain, use, or disclose personal information for purposes beyond providing services directly to us for our business or commercial purposes.

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- 6.6 **Compliance with Laws.** We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose your personal information to government or law enforcement officials or private parties in response to lawful requests when we believe disclosure or sharing is necessary to comply with any legal obligation, enforce or apply our terms and conditions, respond to claims and legal process, protect our services, members, dealers, our rights and/or the safety of the public or any person, or prevent or stop any illegal, unethical or legally actionable activity (including for the purposes of fraud protection).
- 6.7 **Sale or Transfer of Business or Assets.** We may disclose some or all of your personal information in connection with a merger, bankruptcy, or other transaction in which another entity assumes control of all or part of our business. If another company or individual acquires our business, or assets, that company or individual will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Policy.

## 7. COOKIES AND OTHER TRACKING TECHNOLOGIES

Third parties, including Google and Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads. You can opt-out of the collection and use of information for ad targeting using the options described in the Opting Out section below. The tracking technologies we utilize include the following:

- 7.1 **Cookies.** We may use different types of cookies when providing different types of web-related services. If you do not know what cookies are, or how to control or delete them, then we recommend you visit [www.aboutcookies.org](http://www.aboutcookies.org) for detailed guidance. Cookies allow us to identify and authenticate visitors, track aggregate behavior, and enable important service features. We use both session ID cookies and persistent cookies. Session ID cookies are used to maintain your browser state as you browse through services, and they expire when you close your browser. A persistent cookie remains on your hard drive for an extended period, and we use that to identify you should you return to services and want to find information you had previously entered or accessed.

We may also contract with analytics services, third-party affiliate services, and third-party advertising companies to collect similar information. These cookies allow the ad servers to recognize your computer each time they send you an online advertisement, and compile information about you or others who use your computer. This information allows such advertising networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you.

You may disable cookies through your web browser. For information about opting out of these collection services, please see choices below.

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- 7.2 **Analytics**. We may use analytics tools or similar tools provided by third parties (“Data Analytics Providers”) to help analyze how you and other users utilize our services. Analytics tools use cookies and other tracking technologies to collect information such as how often users visit our website, what pages they visit, and what other websites they have used prior to visiting our website. We use the information we get from analytics tools only to improve services. Analytics tools collect the IP address or other unique identifier assigned to you on the date you visited services. We do not combine the information generated through the use of analytics tools with your other personal information. Analytics tools provided by third parties plant a persistent cookie on your web browser to identify you as a unique user the next time you visit our website, and the treatment of that information is governed by the third party’s terms of use and/or privacy policy. To learn about how Google uses data related to website analytics when you use our site or apps, click here: <https://policies.google.com/technologies/partner-sites>. For information about how Facebook uses cookies and other storage technologies, click here: <https://www.facebook.com/policies/cookies/>.
- 7.3 **BY USING OUR WEBSITE, YOU GIVE CONSENT FOR US TO SHARE YOUR DATA AS OUTLINED IN THIS SECTION AND FOR OUR THIRD-PARTY PARTNERS, ANALYTICS PROVIDERS, AND ADVERTISERS TO TRANSFER THIS INFORMATION ONWARD TO THEIR PARTNERS IN CONNECTION WITH PROVIDING YOU SERVICES.**

## **8. DATA RIGHTS & OPTING OUT**

We give you certain choices regarding our use and disclosure of your personal information for promotional purposes. You may opt out from receiving electronic communications from us by contacting us using the contact information provided below. If you no longer want to receive promotional emails from us, you may opt out according to instructions in such communications. Please note that if you opt out of receiving marketing-related messages, we may still send you important administrative messages and alerts and notices regarding your account(s) with us.

If applicable law provides you with the right to review, correct, update, or delete personal information that you previously have provided to us, please contact us using our contact information below should you wish to do so. We will respond to your request consistent with applicable law.

## **9. CHILDREN'S PRIVACY**

Our Services do not address anyone under the age of 13. We do not knowingly collect personal information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we

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become aware that we have collected personal information from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

#### **10. TRANSFERS OF INFORMATION**

Your personal information may be processed in the country in which it was collected and in other countries, including our service providers, affiliates, contractors, and suppliers located in Mexico, Japan, Thailand, and Philippines. The data protection and privacy laws in these countries may provide a different level of legal protections and remedies than your country of residence. We utilize various technical, administrative, physical, and contractual controls to protect your personal information, including when your personal information is being transferred or processed in other countries. By submitting your personal information, you agree to this transfer, storage and/or processing, including all associated risks.

#### **11. INFORMATION SECURITY**

No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. We make efforts to protect your personal information from improper or unauthorized loss, misuse, access, disclosure, alteration, or destruction. If you have questions about the security of your personal information, contact us at the email or regular mail address specified in the Contact section below.

#### **12. DATA RETENTION**

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **13. THIRD-PARTY LINKS**

Our websites or apps may contain links to other websites or apps. We are not responsible for the privacy practices or the content of these other websites or apps. You should read the policy statement of these other websites or apps to understand their policies. When you access linked websites or apps, you may be disclosing private information. It is your responsibility to keep such information private and confidential.

#### **14. CHANGES TO THIS PRIVACY POLICY**

We may update this Policy from time to time, in our sole discretion. When we do so, we will post the new Policy on our website. You should consult this Policy regularly for any changes. Continued use of services following posting of such changes constitutes your acknowledgement of such changes and agreement to be bound by the changes. If you do not agree, you should immediately discontinue your use of our website and services.

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## 15. CONTACT US

If you have questions regarding this Policy, its appendices, or our treatment of your personal information, you may contact us at:

DENSO TEN AMERICA Limited.  
 30155 Hudson Drive  
 Novi, MI 48377  
 Attention: Privacy Officer  
 Email: [grm-tnam-Privacy-Policy@denso-ten.com](mailto:grm-tnam-Privacy-Policy@denso-ten.com) with the subject "Privacy Policy Questions"

## REVISION SUMMARY

Revision Level (& History)	Revision Date	Process Owner	Reason and Comments	Expiration Date
Original	10/12/2023	Administration	Initial Release	10/11/2026
A	06/20/2024	Administration	Removed reference to MovinCool and grammar correction under Section 7.	10/11/2026