

# **Privacy Policy Regarding Data Collected from cameras (CCTV) installed on and around public roads**

## **1. About this policy**

Honda Motor Co., Ltd. (“Honda” or “we”), a limited company established and existing under the law of Japan, having its principal office located at No. 1-1 Minami-Aoyama, Minato-ku, Tokyo, Japan collect images and videos from cameras (CCTV) which are installed on and around public roads and other public locations in Chiang Mai for our research and development of advanced safety systems (the “Project”). If you live in or commute through Chiang Mai, such images and videos to be collected in connection with the Project may include your personal data as further described in Section 2 of this privacy policy (“Policy”).

This Policy provides to relevant data subjects and the general public necessary information as we are or may be required to do so pursuant to the Personal Data Protection Act B.E. 2562 (A.D. 2019) of Thailand and regulations issued pursuant thereto, as well as other applicable laws (collectively, the “Laws”) in connection with our undertaking of the Project, including purposes of the data collection, what data we will collect, how we will collect it, your statutory rights under the Laws, how to contact us in order to exercise your statutory rights, etc.

Unless the circumstances indicated otherwise, Honda are the sole controller of the personal data collected in connection with the Project from the moment the images and videos are collected by us until the moment such images and videos are destroyed, deleted, disposed of or anonymized in accordance with the Laws.

We may update this Policy from time to time as appropriate to comply with the Laws or any changed circumstances. The latest version of the Policy will be made available on <https://www.thaihonda.co.th/> and shall prevail over any other older versions.

## **2. Personal data we collect**

We collect images and videos of people riding motorcycles on public roads from cameras (CCTV) which are installed on and around public roads and other public locations in Chiang Mai. Such images and videos may include personal data of riders and passers-by, such as their faces and other physical characteristics and license plate numbers as well as other identifiers of motorcycles and other vehicles at the relevant locations.

## **3. Sources of personal data**

We collect your personal data from cameras (CCTV) installed or to be installed by us in Chiang Mai. We may also collect your personal data from other public and private agencies which installed cameras (CCTV) in other locations and subsequently granted us the permission to access similar images and videos for the purposes of the Project.

## **4. Purposes and legal bases of collecting and processing your personal data**

We collect, use, disclose, transfer, and otherwise process your personal data pursuant to this Policy only to the extent necessary for research and development of our advanced safety systems. In particular, we use images and videos collected from cameras (CCTV) to conduct studies, researches, and statistical analyses in connection with riding behaviors of motorcycle riders on public roads to train and develop our artificial intelligence programs and other systems, with an aim to improve road and traffic safety. Depending on the circumstances, such advanced safety systems and any derivatives

thereof may or may not be commercialized by us or other parties in the future.

Our collection, use, disclosure, transfer, and otherwise process your personal data are based on legal exemptions relating to studies, researches and statistics and/or our legitimate interests which exemptions allow us to collect, use, disclose, transfer, and otherwise process your personal data without your consent, subject to requirements and restrictions under the Laws.

## **5. Disclosure of your personal data**

Generally speaking, we will not provide, disclose to or share your personal data with third parties unless it is necessary for the purposes of the Project as described in this Policy and strictly in compliance with the Laws.

Nevertheless, we may, from time to time, disclose your personal data to one or more of the following parties as necessary and strictly for the purposes of the Project and in compliance with the Laws:

- our representatives, employees and agents;
- our subsidiaries and affiliated companies;
- our external advisors, consultants and other relevant services;
- our data processors which have entered into a data processing agreement with us to process your personal data strictly in accordance with our instructions; and
- regulators and other government agencies as may be required by law.

In any case, we will ensure that the recipients of your personal data:

- undertake to comply with the Laws and the principles of this Policy.
- only process the personal data for the purposes set out in this Policy; and

- implement appropriate technical and organizational security measures designed to protect the integrity and confidentiality of your personal data.

## **6. Security measures**

We have established appropriate organizational and technical measures including physical measures and management protocols to prevent unauthorized access to or use, modification, disclosure or destruction of your personal data. We have in place security measures to secure your personal data stored on our storage devices.

Please note that Honda implements security measures such as (i) establishing internal rules for the processing of personal data, (ii) appointing a person to be in charge of managing personal data for each department that processes personal data, (iii) implementing security measures in accordance with the internal rules mentioned above, and (iv) thoroughly informing and educating its employees in regard to such internal rules.

## **7. Storage limitation of your personal data**

We will retain your personal data only for the period necessary to process such personal data for the purposes of the Project as described in this Policy. Typically, we will anonymize your personal data with a few working days upon collection of images and videos from our cameras (CCTV), 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 so required. In the absence of any unusual circumstances including unexpected delays and extensions of the Project in the future, we would not retain your personal data beyond the aforesaid period.

Please note that Honda will retain your personal data stored on Honda's storage devices in its collected form until Honda has

anonymized it. Your personal data normally will be anonymized as soon as practically possible.

At the end of the applicable data retention period or when your personal data is no longer required for the relevant purposes, we will delete, destroy, or anonymize your personal data in accordance with the requirements under the Laws and prevailing standards.

## **8. Transfer of your personal data outside Thailand**

We will not transfer your personal data collected in Thailand outside Thailand unless such transfer is legally permitted under the Laws, for example, where the destination countries are considered to have adequate data protection standards or where we are otherwise permitted to do so. In so doing, however, we will ensure that appropriate safeguards required under the Laws will be implemented.

Please note that Honda transfers Honda's storage devices to Japan or the USA after Honda has anonymized your personal data stored on Honda's storage devices.

## **9. Your statutory rights under the Laws**

As a data subject under the Laws, you are afforded, among others, the following statutory rights, subject to applicable legal requirements and exceptions:

- 1) **Right to access to and obtain a copy of your personal data:** You have the right to request access to and obtain a copy of your personal data collected and maintained by us. You may also request that we disclose to you the sources of your personal data which we collected without your consent.
- 2) **Right to object to the processing of your personal data:** You have the right to object to the processing of your personal data based on our legitimate interests unless we can demonstrate a compelling legitimate ground or such data processing is required

by us for the establishment or exercise of, compliance with, or defence against legal claims.

**3) Right to delete, destroy, or anonymize your personal data:**

You have the right to request that we delete, destroy, or anonymize your personal data collected and maintained by us in cases where: (1) your personal data is no longer necessary in relation to the purposes for which it is processed; (2) you have withdrawn your consent to the processing of your personal data and we do not have any other legal basis to carry out the same; (3) you have objected to the processing of your personal data and we have no right to reject your request; or (4) your personal data is unlawfully collected, used, and/or disclosed.

**4) Right to suspend the use of your personal data:** You have the right to request a suspension of the use of your personal data under the following circumstances: (1) while we are correcting or updating your personal data; (2) when your personal data is unlawfully collected, used, and/or disclosed but you choose the request a suspension of the use instead of deletion; (3) when your personal data is no longer necessary to be maintained in relation to the purposes for which it is collected but you have the necessity to have it maintained for the establishment or exercise of, compliance with, or defence against legal claims; or (4) while we are verifying whether we can deny your objection to process your personal data based on our legitimate interests.

**5) Right to report non-compliance to the regulator:** If you discover that we or our employees, contractors, or data processors violated or failed to comply with the Laws, you may report the same to the regulator.

## **9. Contacts**

If you have any comments or questions concerning our collection, use, and/or disclosure of your personal data in connection with the Project or if you would like to exercise any of your rights under the Laws with

respect to your personal data collected, used, and/or disclosed by us hereunder, you may send your comments, questions, and/or requests to the following addresses:

Honda Motor Co., Ltd.

Address: 2-1-1, Minami-Aoyama, Minato-ku, Tokyo, 107-8556, Japan

Tel: +81 48 464 2511

Email: data\_collected\_from\_cameras\_tha@honda.co.jp

Operating hours: Monday to Friday, 08.30 – 17.30 hrs. (Japan time)

Honda's local representative in Thailand for the exclusive purpose of this Policy:

Name: Pisut and Partners Co., Ltd.

Tel: +66 2026 6226

Operating hours: Monday to Friday, 09.00 – 18.00 hrs. (Thailand time)]

Last updated: 1st April 2024