



Privacy Statement

DRIVE COACH by DrivOlution

DrivOlution and your employer collaborate to provide a DRIVE COACH app. This privacy statement describes how DrivOlution and your employer process personal data in the context of the DRIVE COACH app.

For the processing purposes outlined here, DrivOlution and your employer are jointly responsible:

- a) DrivOlution NV VAT BE0875 729 658 – "DrivOlution"
Address: Remylaan 4C bus 1, 3018 Wijgmaal.
DPO Email: privacy@drivolution.be
- b) Your employer

DrivOlution and your employer have entered into an agreement that governs their joint responsibility for the processing of personal data for the specified purposes.

The essence of this agreement is that:

- a) DrivOlution provides the necessary information regarding the processing of personal data when you install the DRIVE COACH app.
- b) The employer includes a reference to this in its Privacy Policy.
- c) The employer only processes personal data within the context of coaching and training, avoiding further processing unless it is compatible and specifically refraining from using personal data for sanctions.
- d) You as a user can always direct your questions regarding the exercise of your rights in connection with the processing of your personal data to one of the parties. DrivOlution and your employer ensure that your questions are forwarded to the party that can provide an appropriate response.



Why do we process your personal data?

Your personal data is processed for the voluntary use of the DRIVE COACH app, aiming to monitor driving behavior and assign safety, distraction, eco-drive, and speeding scores. Based on these scores, personalized coaching and training are recommended to encourage safe and fuel-efficient driving behavior.

DrivOlution also processes your personal data independently of your employer to provide services as specified in the privacy statement.

The legal basis for this processing is the legitimate interests of DrivOlution, your employer, and third parties. Specifically, these legitimate interests include the freedom to conduct business (to operate as a company), compliance with your employer's obligations or policies regarding corporate social responsibility, and the societal and third-party interests in promoting safe and ecological driving behavior.

For the processing of speeding, as described above, DrivOlution additionally relies on the explicit, written consent of the individuals involved.

Which personal data do we process?

We process personal data provided directly by you, made available by your employer, and obtained through the DRIVE COACH app. Each data controller processes only the personal data that is relevant to its respective purposes.

We process the following personal data:

- By DrivOlution and your employer (for your employer):
 - Identification data (such as your name)
 - Contact details (such as your email address)
 - Professional data (such as your employer and working hours)
 - Data necessary to provide services (such as the type of vehicle, type of smartphone, etc.)



- Number of relevant trips
 - Duration of relevant trips
 - Distance of relevant trips
 - Eco-driving score
 - Safety score
 - Distraction score
 - Speeding score
- Only by Drivolution:
- CO²-related data (consumption, savings, potential savings, CO² emissions)
 - Safety data, such as sudden accelerations or braking indicating less consistent driving behavior, as well as driving behavior in turns
 - Eco-driving data, measured based on accelerations, decelerations, braking behavior, and speed maintenance during trips
 - Acceleration score, deceleration score, and speed maintain score
 - Location data, to confirm that the vehicle is in motion
 - Traffic safety-related personal data, such as the speed of your vehicle linked to the location of your vehicle, with your explicit written consent
 - Speeding data, calculated based on the time and distance the vehicle's speed exceeds the speed limit, and speeding score

Your employer does not have full access to the underlying data. In particular, the employer does not have access to location data and traffic safety-related data, such as potential speed violations or the use of your smartphone while driving. Additionally, your employer does not have insight into detailed driving habits, such as abrupt or consistently smooth driving behavior. The employer only receives aggregated scores resulting from the analysis of the app. These scores are recalculated on a weekly basis.

These personal data are obtained directly from the individuals themselves or generated by the operation of the app. At the initiation of the processing, limited personal data are transmitted by your employer to Drivolution to facilitate the installation of the DRIVE COACH app.



How long do we retain your personal data?

The personal data are retained in accordance with the following periods:

- Data registered via the smartphone is deleted or anonymized 8 weeks after registration.
- For your account data related to other processes, the general statutory limitation period applies.

Recipients of your personal data

In the context of our processing activities, your personal data may be disclosed to one or more recipients, depending on the context. The legal basis for these disclosures aligns with the legal basis for the processing. The personal data may be disclosed to:

- Yourself as the data subject or to the representative you appoint;
- Your employer, taking into account the limitations outlined in the section "Why do we process your personal data?";
- Processors engaged in processing activities;
- Belgian and international authorities, to the extent required by law.

Export of Personal Data

The storage of data for the processing of personal data within the context of using the DRIVE COACH app takes place within the European Economic Area.



Your Rights Under the GDPR

The General Data Protection Regulation (GDPR) grants you, as the data subject, several rights that you can exercise with regard to us.

1 - What rights do you have?

The GDPR provides you with several rights as a data subject. To simplify the exercise of these rights, we provide you with background information on these rights and how you can exercise them. Under certain circumstances, the GDPR imposes limitations on these rights.

Right to Information: You have the right to general information about the processing of your personal data. This information is provided through the general privacy statements of DrivOlution and your employer or through this specific privacy statement.

Right of Access: If you want to know whether we process personal data about you or wish to know which personal data we process about you and receive certain information about this processing, you can exercise your right of access with us. You can also request a copy of your personal data.

Right to Rectification: If you find that we process incorrect or incomplete personal data, you can ask us to correct or supplement this personal data. You can easily adjust some of your personal data in the DRIVE COACH app.

Right to Erasure: In specific cases, you can request the deletion of your personal data, e.g., when the retention period for this personal data has expired. However, this right is not absolute. For example, we may still retain personal data to comply with obligations under applicable laws and regulations that require or permit us to retain your data or in the context of legal proceedings.

Right to Restriction: According to legal conditions, you may request to restrict the processing of your personal data. DrivOlution may also decide to restrict processing



under certain circumstances. Processing of your personal data remains possible in exceptional cases, e.g., with your consent or in the context of legal proceedings.

Right to Withdraw Consent: If you have given consent to process your personal data, you have the right to withdraw that consent at any time by notifying us. The withdrawal of your consent does not affect the data processing that took place based on your consent until that moment.

Right to Data Portability: When data processing is automated and based on your consent or on a contract, you may request your personal data from us in a portable format.

Right to Object: If processing is based on legitimate interests or public interest, you can object to this processing based on reasons specific to your situation. In such cases, we may still further process your personal data if we can demonstrate compelling legitimate grounds that outweigh your interests or if the processing is related to legal claims.

Right to Object to Automated Individual Decision-Making, Including Profiling:

If you have questions or concerns about the outcome of an automated decision, you can contact us. We will inform you about the logic behind a decision and the consequences that result from it. You have the right to challenge the decision and request human intervention.

Right to Lodge a Complaint: You also have the right to lodge a complaint with the relevant supervisory authority. In Belgium, the competent supervisory authority is the Data Protection Authority.

If you are dissatisfied with how we process your personal data or intend to file a complaint, we encourage you to first contact one or both of the aforementioned Data Protection Officers to find a swift resolution to your issue.



2 - How can you exercise these rights?

You can exercise your rights by contacting us, preferably through one or both Data Protection Officers using the provided contact information. When exercising your rights, we ask you to be as specific as possible so that your request can be handled concretely.

We also point out that your identity must be reasonably verifiable to exercise your rights, preventing someone else from exercising these rights on your behalf. As a principle, we use the same identification and verification methods as when we collected your data. Sometimes we may need to ask you to provide evidence of your identity. For example, if you ask us to do something that requires us to provide you with data, we want to ensure that we do not provide your data to someone else. Similarly, if you ask us to delete important data, we want to ensure that anyone cannot cause us to delete data that you expect us to have.

3 - Limitations if we cannot identify you

For certain processing, such as statistical processing, we may have encrypted or pseudonymized personal data, making it impossible for us to identify you. In that case, certain rights according to the GDPR may not apply.