This Privacy Notice describes how Magna Electronics Europe GmbH & Co. OHG ("Magna" or "we" or "us" or "our"), as controller, processes your personal data, in particular within the meaning of the EU General Data Protection Regulation ("GDPR") in the event that one of our vehicles collects your information as part of our project to develop vehicle tools to improve pedestrian and road safety ("Data Collection Project").

1. Categories of personal data, processing purposes, legal basis and source

If you encounter one of our vehicles engaged in the Data Collection Project, it may collect the following personal data about you: location; audio, electronic or visual information; and special categories of personal data such as facial features, race, age, gender, religion, disability, color, national origin, medical conditions (if any of these are visible).

Magna processes such personal data to validate and improve vehicle tools that reduce the risk of traffic accidents. Such tools recognize traffic participants near a vehicle and act as a driving aid. In addition, the data collected during the project will allow us to re-validate our algorithm to determine whether it still correctly assesses and reacts to objects encountered while driving.

Magna and its customers (with whom we have contracts) have legitimate interests in gathering this personal data to advance the Data Collection Project. Therefore, the legal basis for the processing of such personal data is Article 6(1)(f) of the GDPR. More information on the balancing of interests test is available upon request.

The processing of special categories of personal data (as the case may be) is necessary for scientific research purposes and the interests of Magna in processing substantially outweigh those of the data subject in not processing the data (Article (9)(2)(j) of the GDPR and Section 27 (1) of the German Federal Data Protection Act ("FDPA")). More information on the balancing of interests test is available upon request.

2. Recipients

2.1 Transfer to service providers

Magna may engage external service providers to provide certain services to Magna in connection with the Data Collection Project. Such services include the annotation of the data our vehicles collect, which is necessary to identify and label the objects (e.g. traffic signs) that are found in the data we have collected. When providing such services, the external service providers may have access to and/or may process your personal data (i.e. they may act as processors on our behalf). The personal data will be shared with the service providers in an encrypted transfer.

We will sign contracts with those external service providers that will require them to safeguard the personal data and to process such data only as instructed.
2.2 Other recipients

Magna may also transfer your personal data to law enforcement agencies, governmental authorities, legal counsel and external consultants in compliance with applicable data protection laws. Our reason for such potential transfers could be compliance with our legal obligations or advancing our legitimate interests, such as the exercise or defense of legal claims. More information on the balancing of interests test is available upon request.

2.3 International transfers of Personal Data

The personal data that we collect about you may be transferred to and processed by recipients which are located in the European Economic Area or in Israel. Israel is recognized to provide an adequate level of data protection from an EU law perspective (Article 45 GDPR). The access to your personal data is limited to recipients with a need to know it.

3. What rights do you have and how can you assert your rights?

You may have the right to: request access to your personal data, request rectifications to your personal data; request erasure of your personal data; request restriction of processing of your personal data; and object to the processing of your personal data.

Please note that these rights might be limited under the applicable national data protection law. To learn more about these rights, please click on this link. Refer to section 5, below, to learn how you can contact us to exercise your rights.

You also have the right to lodge a complaint with a data protection supervisory authority.

4. How long do we keep your personal data?

Your personal data will be retained as long as necessary in order to (a) verify software or hardware updates, as explained above; (b) improve technology; (c) develop new safety and security features; (e) enable our customers to improve safety and security features; and (f) defend against any litigation that may arise in the future (e.g. to show, in case of an accident, that an object was correctly detected and classified as a pedestrian by Magna’s systems). When Magna no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it. That may change if we need to keep your information, including personal data, to comply with legal or regulatory obligations to which Magna is subject, e.g. statutory retention periods which can result from the Commercial Code and/or the Tax Code and usually contain retention periods from 6 to 10 years, or if we need it to preserve evidence within the statute of limitation, which is usually three years but can be up to thirty years.

5. Contact us

If you have concerns or questions regarding this Data Processing Notice, please contact us as follows:

Magna Electronics Europe GmbH & Co. OHG
Kurfürst-Eppstein-Ring 11, 63877
The contact details of our data protection officer are as follows: Peter Schweickard, Magna International (Germany) GmbH, Kurfürst-Eppstein-Ring 11, 63877 Sailauf, phone: +49 6093 9942 7850, email: Peter.Schweickard@magna.com.
Exhibit

Your Rights

1. **Right of access**

   You may have the right to obtain confirmation from us as to whether or not we have processed your personal data. If so, you may request access to that personal data. The information you may access includes the purposes of our processing, the categories of your personal data we have processed, and the recipients (or categories of recipients) to whom your personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access. The right of access is limited under Section 34 of the FDPA. For example, the right of access does not apply if the data collected (a) may not be erased due to statutory retention requirements, or (b) only serve the purposes of monitoring data protection or safeguarding data, providing the access would require disproportionate effort, and appropriate technical and organizational measures make processing for other purposes impossible.

   You may have the right to obtain a copy of your personal data which we are processing. However, we may charge a reasonable fee for additional copy requests based on administrative costs.

2. **Right to rectification**

   You may have the right to request that we rectify inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. **Right to request erasure ("right to be forgotten")**

   In certain circumstances, you may have the right to request that we erase your personal data. Section 35 of the FDPA limits this right in certain cases. For instance, the right is not applicable if a non-automated erasure would be impossible or would involve disproportionate effort, and if your interest in the erasure is minimal. In such cases, you may have the right to restriction of processing.

4. **Right to restriction of processing**

   Under certain circumstances, you may have the right to restrict our processing of your personal data. In such a case, the relevant data will be marked and may only be processed by us for limited purposes.

5. **Right to object**

   In certain circumstances and for reasons relating to your particular situation, you may have the right to object to the processing of your personal data by us and we may be required to no longer process your personal data.