

Greater Than's Privacy Policy for customers using the Greater Than applications

Greater Than AB with business registration no: 556965-2885, at Karlavägen 60, 114 49 Stockholm and its subsidiaries (hereinafter referred to as "GT", "we" or "us"), takes personal privacy seriously and therefore provides this privacy policy (hereinafter "Privacy Policy") to inform you on how GT in its capacity as a personal data controller processes your personal data as a customer and end-user of GT's app and/or dongle (hereinafter "Product").

1. Who collects your Personal Data?

- 1.1 GT is the personal data controller responsible for the personal data processed under this Privacy Policy, except as set out in Section 1.2 below.
- 1.2 For the processing of driving behavior and vehicle telematics data carried out in connection with the FIA Driver Safety Index, a service through which GT processes driving behavior and vehicle telematics data, including GPS coordinates, by applying pseudonymization techniques upon data ingestion solely to enable index calculation, with anonymized and aggregated safety and risk indices generated for road safety analysis and benchmarking, GT and the Fédération Internationale de l'Automobile ("FIA"), Place de la Concorde 8, 75008 Paris, France, act as joint data controllers pursuant to Article 26 of the GDPR. For information on FIA's processing, please refer to FIA's privacy notice at: [LINK](#)

2. What is Personal Data?

The personal data covered by this Privacy Policy is such personal data that you provide to GT in connection with the use of the Product as described in this Privacy Policy, such as, for example, your name, address, email address, phone number, your payment information, car registration number etc. which may be linked to you as a natural person ("Personal Data"). Information which cannot directly or indirectly be associated with you is not Personal Data.

3. What type of Personal Data does GT collect, process and store, and for what purpose?

GT collects, processes and stores the following Personal Data in structured material (for example in databases, customer management systems, IT-systems etc.) and in unstructured material (for example on web pages, in documents, in e-mails, social media, articles) and in electronic form and in paper form for the situations described below:

3.1 Customer

- 3.1.1 GT may collect, process and store the following Personal Data of you as GT's customer and end-user of GT's Product:

Identification data:

- Name, company, address, post code, city, country
- E-mail address and telephone number

- The price of your car insurance
- Name of your insurance company where your car is insured
- Registration number of your car

Usage data (raw data):

- Driving pattern (acceleration, speed, brakes, turns and G-forces)
- Carbon dioxide emissions
- Driving log
- Score for each trip
- GPS location and start and end points of the journey
- Driven kilometers
- Premium of car insurance
- A credit check
- Bank account and financial information

If a customer contacts GT for customer support, GT also collects the following information to verify the identity of the customer:

- Phone number
- Name
- Email address
- Information about the device and browser used
- Network connection
- IP address
- Other personal information provided during the contact

After GT has collected the usage data (raw data) based on driving behavior, GT will keep the raw data separate from your identification data. GT uses pseudonymization, which means that the Personal Data can no longer be attributed to a specific data subject without the use of supplementary data, provided that this supplementary data is stored separately and is subject to technical and organizational measures that ensure that the Personal Data is not attributed to an identified or identifiable natural person.

3.1.2 For what purposes does GT collect, process, and store your Personal Data as a customer of GT's?

- a) To fulfil the agreement GT entered with you as a customer
- b) For fulfilling GT's obligation under law or other statute
- c) To provide and administer the Product GT is offering to you as a customer (e.g. to calculate the price of your car insurance, to analyze your driving during each trip, to reward you for safe and eco driving, to ensure driving safety, to analyze customer driving safety patterns, to send notifications on your smart driving performance)
- d) To provide services and the Product
- e) To meet your requests as a customer
- f) For your payment and accounting purposes
- g) For invoicing your insurance company, fleet etc.
- h) For work on quality on the Product
- i) To check if you have any payment defaults and make a credit check

- j) To ensure customer recognition
- k) For risk calculation, risk management, analyses, business-, operational- and method development, marketing
- l) For auditing and accounting purposes
- m) For claims and insurance matters
- n) To personalize and improve your user experience of the Product
- o) To send notifications and messages through e-mail, phone and electronic communication (such as SMS or e-mail)
- p) To inform you regarding updates of the Product and our policies
- q) Improve and develop the Product
- r) To develop new services, products and research
- s) Analyze your usage of the Product and ensure the technical functionality of the Product
- t) Forestall and investigate misuse of the Product and fulfil obligations in accordance with the law
- u) For confidentiality, administrative, security and education issues,
- v) For quality works, statistical purposes, and trends
- w) For payment defaults by making a credit check
- x) For making automated decisions to determine whether you have a smart driving pattern.
- y) To store your Personal Data and to access your Personal Data that is already stored in the car via your terminal equipment (e.g. mobile phone, dongle)
- z) To transfer your Personal Data to a third party in accordance with this Privacy Policy.
- aa) To process driving behavior and vehicle telematics data, including GPS coordinates, for the purpose of generating anonymized and aggregated safety and risk indices for road safety analysis and benchmarking (FIA Driver Safety Index). Personal data are pseudonymized upon ingestion and only anonymized and aggregated outputs are made available within the FIA Driver Safety Index platform.

3.1.3 How does GT gain access to your Personal Data as GT's customer?

Most of the Personal Data that GT processes about you is collected directly from you as a customer, which includes the types of Personal Data that is generated through your use of our Product. GT can from time to time also collect and process Personal Data from other sources such as insurance companies, fleets, service providers, registers from governmental agencies or other private and public registers such as partners, advertising networks, network providers or other partners which help us understand user activities, your preferences or to improve and personalize the Product. GT only asks you for the Personal Data that GT needs to fulfil our contractual and statutory obligations towards you and the company you represent. Personal Data that you provide to GT and that GT does not need for any of the purposes that we process personal information for is deleted promptly. In the event that GT processes such information about you to any other extent than described in this Privacy Policy, GT will ensure that we are entitled to do so by law and that you are informed of the processing.

3.1.4 On what legal basis does GT process your Personal Data as a customer?

GT's legal basis for processing Personal Data described in point 3.1.2 a), c)-k), m)-q), s), u), y), z) is based on the **agreement** we entered into with you.

GT's legal basis for processing Personal Data described in point 3.1.2 b), i), l), t), x) is based on **the law** (e.g. The Credit Information Act, the Accounting Act etc.).

GT's legal basis for processing Personal Data described in point 3.1.2 r), v) is based on our **legitimate interest** to develop new features to give you the most optimal Product.

GT's legal basis for processing Personal Data described in point 3.1.2 y), aa) is based on **your consent** (see Article 5.3 in the Directive on privacy and electronic communications, 2009/136 EG).

GT's legal basis for processing Personal Data described in point 3.1.2 bb) is based on our **legitimate interest** in promoting road safety and the development of evidence-based road safety measures.

3.1.5 Giving consent

GT needs your consent:

- to store and to be able to access your Personal Data already stored in the car via your devices such as your mobile phone and/or dongle when using the Product;
- to make automated decision making when you are using the Product; and
- to transfer the Personal Data to your insurance company, the fleet etc. and other third parties in accordance with this Privacy Policy. You have the right to withdraw your consent regarding these situations at any time. Please see point 9.1-9.3 regarding how to withdraw your consent.

After GT has stored or gained access to your Personal Data already stored in the car via your mobile phone and dongle (based on the legal ground consent), GT will continue to process your Personal Data as a part of the agreement you entered into with GT before using the Product.

By accepting this Privacy Policy you give your consent for GT to (i) store and to be able to access your Personal Data already stored in the car via your devices such as your mobile phone and/or dongle when using the Product; (ii) to transfer the Personal Data to your insurance company, the fleet etc. and other third parties in accordance with this Privacy Policy; and (iii) for GT to make an automated decision when you are using the Product.

3.2 **Information about your use of the Product etc.**

In addition to the information you provide to GT, we may also collect information about your use of the Product on your device (your mobile phone and/or dongle) in other ways. GT may, for example, collect:

3.2.1 Log information:

This Personal Data is registered for GT's and our customers' safety. This information is used only to detect and counter irregularities and sabotage as well as in case of serious suspicion of unfair or criminal behavior or a serious suspicion of using the IT equipment in violation of GT's rules.

GT is logging in the following situations for security reasons:

- logging when you are using a web portal or any other of our services
- logging your e-mail

- logging when you as a customer are connecting to a network of GT

3.2.2 Statistical information

GT collects technical usage and performance data through telemetry and analytics tools such as Microsoft Application Insights. This information is used to monitor the performance, security and stability of the Product, understand how the Product is used, and improve functionality.

3.2.3 Geographical information

When using the Google Analytics service or similar system, the region and country of the IP address are retrieved for statistical purposes.

3.2.4 Other information

Other information about your use of the Product, such as the programs and services you use, and how you interact with content offered through a GT Product for the purpose of developing our Product and to determine how we will further develop and prioritize our Product internally.

3.3 **Information from third party sources**

GT can receive information about you from public and private actors (in accordance with laws and regulations) which we can combine with other data we receive from or about you. GT may also receive information about you from third party social networking services when you choose to connect to such services.

4. **Automated decision making**

Automated decisions in accordance with the General Data Protection Regulation ("GDPR") mean that the decisions are determined without any manual human involvement. GT makes decisions about you based on automated decision-making when you are using GT's Product. GT determines for example when using the GT's Product the distance of your driving and driving behavior with automated processes through AI. This information might be the foundation of the decision of your insurance premium. You have the right to contact us if you are not satisfied with such an automatic decision.

5. **For how long does GT store your Personal Data?**

GT will only store your Personal Data for as long as we need to provide our Product to you in accordance with the agreement you, or the client, as applicable, entered into with GT before you are able to use the Product and no longer than permitted under the GDPR regarding the storage and screening of Personal Data or as evident from any statutory obligation to store the information for a longer period of time. GT continuously evaluates the length of time required for different types of data. When Personal Data is no longer needed, GT will delete or anonymize your Personal Data. You retain the right to contact us if you don't want your Personal Data to be used for direct marketing by contacting us on info@greaterthan.eu.

6. **Is there any transfer of your Personal Data to third parties?**

- 6.1** GT will not sell, exchange or license any Personal Data about you beyond what is being stated in this Privacy Policy if we are not obliged by law due to a demand by a

governmental agency, court decision or if we receive your consent to do so. Companies belonging to the GT Group may process Personal Data in accordance with general data protection legislation and for the purposes stated in this Privacy Policy. Your Personal Data will be handled by authorized personnel within the GT Group to the extent required for the processing. The Personal Data will never be available to all employees of GT, but only to a limited number of authorized people who need access to the Personal Data to perform their tasks. GT also uses external parties to help us process your Personal Data on our behalf. When GT hires Personal Data processors, we always ensure by agreement that your Personal Data is protected in an appropriate manner and processed in accordance with current data protection legislation.

6.2 By using the Product your Personal Data may be collected, processed, stored and transferred by GT to the following authorities, partners and suppliers:

- Insurance companies and other partners: GT may need to share your information with your insurance company and other partners to GT in order to provide our Product to you. Please note that GT will only send data needed for insurance purposes such as your driving score and distance (the score that determines the size of your insurance premium based on your driving data) to your insurance company, fleet etc.) and NOT the usage data/raw data i.e. data showing your driving behavior.
- Social Media: Such as Facebook, Instagram, LinkedIn or Twitter etc. If you contact GT via social media your personal information will also be collected and processed by these companies, in accordance with their data protection information.
- Service providers and subcontractors: GT has a few service providers in order for our activity to function. Suppliers and subcontractors of GT are companies that only have the right to process the Personal Data they receive from GT on behalf of GT, so-called personal data processors. Examples of such suppliers and subcontractors are cloud service companies Microsoft, suppliers of financial systems, accounting and bookkeeping companies, software and data storage providers, payment service providers, companies protecting our systems and services and business consultants.
- CRM systems: GT uses CRM platforms like HubSpot to manage customer relationships and communication.
- Analytics Services: When you use Analytics Services, your personal information will be shared with Google or similar systems.
- Other partner sharing: We may share Personal Data with partners within different areas to help us understand and improve the performance of our business, products and partnerships.
- Academic researchers: For activities such as statistical analysis and academic study, but only in a pseudonymized format. Pseudonymized data is where your data is identified by a code rather than your name or other information that directly identifies you.
- Companies within GT Group. GT has subsidiaries and offices in other countries such as UK, Belgium, Singapore, USA, Japan etc. GT may disclose Personal Data to these subsidiaries and vice versa.
- Authorities and financial institutions: GT may provide necessary information to authorities such as the banks, IMY, the Tax Authority or other authorities.
- Law enforcement and other authorities: GT may need to share Personal Data with courts and other authorities to comply with a legal obligation, to respond to a valid legal process (such as a search warrant, court order, or subpoena) for our own or a third party's justifiable interest, relating to: national security, law enforcement, litigation (a

court case), criminal investigation, protecting someone's safety, preventing death or imminent bodily harm.

- Acquirers of GT's business: In the event that GT sells, or enters into negotiations to sell, its business to a buyer or potential acquirer, we may transfer your Personal Data as part of that process. In such cases, GT will notify you before your Personal Data is transferred to the acquirer or before a new privacy policy comes into effect.
- FIA: In connection with the FIA Driver Safety Index, where GT and FIA act as joint data controllers as described in Section 1.2, FIA receives exclusively anonymised and aggregated statistical outputs. FIA has no access to raw personal data, pseudonymised data or individual-level datasets.

6.3 GT ensures that an adequate level of protection as per the applicable Personal Data legislation is fulfilled upon such transfer of Personal Data to another country and/or organization. To the extent that GT transfers Personal Data to a non-EU country which, according to the European Commission, does not achieve an adequate level of protection, GT will ensure that the transfer is subject to applicable model clauses or standard safeguards regulations adopted by the European Commission. This also applies, where applicable, to transfer to any Personal Data processor who processes Personal Data for the purposes stated in this Privacy Policy on behalf of GT.

6.4 Except as provided in this Privacy Policy, GT will not transfer your Personal Data to other third parties.

6.5 GT maintains strict physical, electronic and administrative security measures to protect your Personal Data in accordance with applicable rules. This means that GT regularly reviews its security and screening policies for the processing of Personal Data.

7. How does GT protect your Personal Data?

GT takes the necessary and appropriate technical and organizational measures to protect your Personal Data and ensure that the GDPR is complied with in the handling of your Personal Data. The security measures GT use may include access control, logging, physical security in data halls, use of firewalls, pseudonymization, encryption, detailed instructions and training for personnel concerning the protection of Personal Data and careful consideration when choosing service providers who process the Personal Data on our behalf. Your information is stored in our protected IT systems and networks. Access is restricted to authorized personnel only.

8. Who is responsible for the information you provide to third parties, the use of social media etc.?

8.1 The information you choose to disclose to third parties is not covered by GT's Privacy Policy. You are responsible for the information that you provide to third parties such as on LinkedIn, Facebook and Twitter.

- 8.2** GT's Product may be accessed through third party services and platforms such as Facebook, Twitter, Google and LinkedIn. You should be aware that GT has no control over, nor is responsible for, the processing of Personal Data by such third parties. GT's Product may also contain links to third party services or websites. If you use such links, you leave GT's Product. GT has no control over such third-party services or websites (nor their content), nor is it in any way responsible for these.
- 8.3** GT can provide features that allow you to share information in your social networks and interact with us.

9. Your right to withdraw your consent

- 9.1** If you have given your consent for GT's Personal Data processing, you have the right to withdraw your consent (but not retroactively) at any time for the processing of your Personal Data. To this end, it is sufficient to send an email to info@greaterthan.eu.
- 9.2** Once you have withdrawn your consent, GT will only use the information that has to be processed to provide the Product, and we will refrain from any other processing.
- 9.3** You also have the right to request that we remove any Personal Data that may be linked to you as a data subject by destroying or disidentifying them.

10. Changes to the Privacy Policy

GT reserves the right to make changes and/or additions to this Privacy Policy from time to time. For example, if applicable law changes or if we change our Product in a way that affects our processing of your Personal Data. You will always find the latest version of this Privacy Policy on our website <https://greaterthan.eu/about-us/legal/>.

11. Your rights

- Right of access - You have the right of access to your Personal Data, which means that you have the right to receive confirmation from GT of whether your Personal Data is processed and if so, you also have the right to access your Personal Data at GT by so-called register extracts. This means that you have the right to receive a copy of your Personal Data and information about (i) which categories of Personal Data are processed; (ii) what the Personal Data is used for; (iii) how long the Personal Data will be saved; (iv) with whom the Personal Data has been shared; and (v) where the Personal Data comes from.
- Right to correction - You have the right to get your Personal Data corrected or supplemented by GT.
- Right to delete - You have the right to have your Personal Data deleted, if
 - Personal Data is no longer necessary for the purposes for which they are processed;

- you withdraw your consent for certain processing and thereafter there is no legal basis for GT to process your Personal Data;
 - your Personal Data has been processed illegally; or
 - the processing of your Personal Data is not necessary to meet applicable legal requirements, to be able to establish, assert or defend legal claims and / or permitted for archival, research or statistical purposes.
- Right to withdraw your consent - If you have given special consent to GT of processing your Personal Data, you always have the right to withdraw your consent.
 - Right to object regarding balancing of interests - When processing of your Personal Data takes place with the support of the legal ground; balancing of interests, you have the right to object to the treatment of your Personal Data at any time. GT will then make a new balance of interests and will only continue the treatment, despite your objection, if we can demonstrate compelling legitimate interests that outweigh your interests.
 - Right to object to direct marketing - You have the right to object at any time to the processing of your Personal Data for direct marketing. If you object, GT will no longer process the Personal Data for such purposes.
 - Right to restriction - You have the right to have the processing of your Personal Data restricted if you, among other things, dispute the accuracy of the information, or if you have objected to processing as above, in both cases during the time GT are investigating and checking your request.
 - Right not to be subject to an automated decision - If GT has made a decision about you that is based entirely on an automated process with no human involvement and the decision has legal consequences or otherwise significantly affects you; you can request that the decision be reconsidered by GT through a renewed and individual assessment. This applies if we cannot demonstrate that an automated decision is necessary to enter into or implement an agreement between you and GT.
 - Right to Personal Data portability - You have the right to Personal Data portability, which means that under certain circumstances you have the right to receive such Personal Data about you that you have provided to GT, in order for you to be able to transfer the Personal Data to another personal data controller.
 - Right to complain to the supervisory authority - You have the right to complain to the Swedish Authority for Privacy Protection, <https://www.imy.se/kontakta-oss> or other competent supervisory authority in the country in question if you believe that GT processes your Personal Data in violation of applicable data protection legislation.

Where GT and FIA act as joint data controllers, you may exercise your rights towards either party. GT is your primary point of contact and will handle all data subject requests relating to the jointly processed personal data. If you submit a request directly to FIA, FIA will forward it to GT without

undue delay. If you wish to exercise any of your rights above, please contact us via info@greaterthan.eu.

12. Contact information

If you have questions about GT's processing of your Personal Data, or if you want to exercise your statutory rights as described above in this Privacy Policy, you are welcome to contact us at the following address and e-mail address:

Greater Than AB
Karlavägen 60
11449 Stockholm
E-mail: info@greaterthan.eu.