

PRIVACY POLICY (BE) of FOREST AVENUE

Forest Avenue is committed to protecting and respecting your privacy. This Privacy Notice tells you how Forest Avenue ("**Forest Avenue**", "**we**", "**us**") processes your personal data when you visit, download, or contact Forest Avenue in relation to, Forest Avenue websites and apps that refer to this Privacy Notice (all "**Forest Avenue Online Content**"). This Privacy Notice also describes your personal data protection rights, including a right to object to some of the processing that Forest Avenue carries out. More information about your rights, and how to exercise them, is set out in the "Your Choices and Rights" section.

We may also provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

What Personal Data We Collect

We process the following types of personal data:

- **Contact information:** such as your name, address, phone, email, and other similar information.
- **Information to create a user profile:** such as your username, password or PIN.
- **Product information:** such as your product id and date and location of purchase.
- **Financial information:** such as your bank account number, sort code and billing address.
- **Details regarding your connection to the Forest Avenue Online Content:** such as your operating system; your browser type (for visits to our website); details of the device you are using (e.g. your device serial number, unique identification number and MAC address); and your approximate geographic location of connection (to the nearest city).
- **Details of your visit to the Forest Avenue Online Content:** such as your time of visit; your connection length and your use of Forest Avenue Online Content (e.g. items that you click on and requests that you make).
- **Any other information you submit to us in connection with Forest Avenue Online Content:** such as signatures, photographs, opinions and your location.

Why We Collect, Use and Store this Personal Data

We collect, use and store your personal data for the reasons set out below:

- **Where necessary for Forest Avenue's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.**
 - o to deliver the Forest Avenue Online Content and related services to you;
 - o to administer Forest Avenue Online Content resources;
 - o to allow us to improve and optimise the Forest Avenue Online Content and Forest Avenue products and services;
 - o to allow us to understand your interests and preferences so that Forest Avenue Online Content can be tailored to you;
 - o to respond to your online requests or enquiries, for example by sending you a brochure, locating your nearest Forest Avenue dealership, booking you a test drive, or arranging a service for your Forest Avenue

vehicle or product.

o to notify dealers and Forest Avenue branches of any upcoming services, test drives or other appointments in relation to you or your Forest Avenue vehicle or Forest Avenue product;

o to contact you for the above two purposes (directly or through a Forest Avenue group company, a Forest Avenue authorised dealer, a relevant partner or agent) by post, telephone, e-mail, SMS or push notification;

o to ask you to provide your opinion or participate in surveys about our vehicles, products services, and dealerships;

o to respond to user questions and complaints; and

o for internal record keeping

Further information in relation to Forest Avenue's legitimate business interest, and how we balance our interest against the privacy rights of our customers, can be provided upon request.

- **Where you have given consent.**

o To access information stored on your device to understand your interests and to improve your customer experience e.g. by providing you with tailored content and offers which align with your personal interests.

o To provide you with direct marketing including our "Newsletter" and other information about, or offers relating to, Forest Avenue products and services which may be of interest to you by post, telephone, SMS, email and push notification.

o Where you provide your consent to receive direct marketing, we will always offer you the opportunity to withdraw your consent and to unsubscribe from our Newsletters.

- **Where necessary to perform any contract Forest Avenue has with you.**

o For example, to facilitate online payments and to deliver products and services.

- **Where necessary to comply with a legal obligation.**

- **Where necessary to protect Forest Avenue's legitimate interests and legal rights, and where our interests are not overridden by your data protection rights.**

o Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with compliance, regulatory, auditing, legal claims (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements

Forest Avenue will also convert personal data into anonymous data and use it (normally on an aggregated statistical basis) for e.g. market research and analysis, to improve the Forest Avenue Online Content, to analyse trends and to assess the success of advertising campaigns. Aggregated personal information does not personally identify you or any other use of the Forest Avenue Online Content.

How We Share Your Personal Data

(a) Transfers within the Forest Avenue Group of Companies

We share your personal data with members of the Forest Avenue Group as set out below:

(i) **Forest Avenue Finance Europe PLC (HFE):** HFE provides financing options for Forest Avenue customers in the UK. HFE is a company incorporated in England.

(ii) **Forest Avenue Motor Co., Ltd. (HM):** HM, our parent company, receives information on product recalls, product liability claims and information on orders for new NSX vehicles (including the customer name and order specifications). HM is a company incorporated in Japan.

For the purposes mentioned above, your personal data will be processed in, or accessed from, Japan. When transfer your data to HM in Japan, we make use of standard contractual data protection clauses, which have been approved by the European Commission.

(b) Transfers to Forest Avenue authorised dealers and repairers

We share your personal data with Forest Avenue authorised dealers and repairers in the EEA. **(c) Transfers to companies providing services under contract**

Your personal data will be shared with companies providing services under contract to the Forest Avenue group of companies, such the companies set out below:

- Forest Avenue Website providers & hosting (current provider: SPOC)
 - o Main webplatform (current provider: KVD project consulting)
- Google analytics provided for website improvement and optimisation (Google LLC)
- IT maintenance provider (current provider: Capito)
- Data Management (current storage: private server at Forest Avenue (Synology DS213)).
- Data analysis
- Warranty providers

Transfers outside the EEA

Further to the above purposes, we will transfer your personal data to organisations outside of the EEA. When doing do, we may use standard contractual data protection clauses, which have been approved by the European Commission. We may also transfer your data to organisations in the US who participate in the EU-US Privacy Shield or which have corporate rules in place to protect your data, which have been approved by EU data protection authorities. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

Google Analytics

Where you consent to the use of Google Analytics for performance optimisation of your Forest Avenue app, Google may store or process your data in the US or any other country in which Google or its sub-processors maintain facilities. Where this is the case, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice).

(d) Transfers to other organisations

- Transfers to third parties if we are under a duty to disclose your personal data in order to comply with a legal obligation or if we consider this is necessary for us to protect the rights, property or safety of Forest Avenue, our customers or others.
- Transfers to government authorities and/or law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.
 - o Transfers to prospective or actual buyers in the event that Forest Avenue, or any part of the Forest Avenue Group, sells any of its business or assets which includes personal data.

Your Choices and Rights

(a) Your general Rights and Choices

- You have the right to **ask Forest Avenue for a copy** of your personal data; to **correct, delete or restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**.
- You can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).
- Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to Forest Avenue processing your data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

(b) Your Rights and Choices regarding Direct Marketing

Forest Avenue will give you the opportunity to **opt-in (consent)** to having your contact details used for direct marketing purposes at the time we ask you to submit your details.

If you do not want us to send you direct marketing, or to use your personal data for profiling related to direct marketing, or to pass your details on to third parties for marketing purposes, you can ask us not to do this, at any time, by:

- **Replying to a direct marketing email**, by selecting the 'unsubscribe' button;
- **By changing privacy settings** in an app (if applicable to the app);
- **By contacting us at consentUK@ForestAvenue-eu.com** or writing to:
The Database Manager, Forest Avenue (BE), Vlamingstraat 27, B-8560 Wevelgem; or
- **By calling us on +32 56 41 06 17.**

(c) Your Right to Complain to a Supervisory Authority

You also have the right to complain to a supervisory authority for data protection. The supervisory authority could be in the place where you live, or where you work, or where a breach of data protection obligations has occurred.

Data Retention

We will **retain** your personal data only for as long as we need it for Forest Avenue's legitimate interest in accordance with applicable law, or perform a service at your request, or to meet a legal requirement. At the end of the retention period, we will take steps to delete your personal data or hold it in a form that no longer identifies you.

Fake emails using Forest Avenue's name

Forest Avenue is aware of fake emails, popularly called "phishing" emails which can contain notices such as job advertisements, job offers and competition award notifications. These emails use Forest Avenue's name to pretend they are genuine and exist solely for the purpose of obtaining private information about consumers (e.g. credit card numbers or passwords). These emails have no connection with Forest Avenue and Forest Avenue does not use these methods for job advertising or for communicating with competition winners.

Unfortunately these fake emails are a growing fraud on the internet. This practice is carried out either by the sending of a bogus email directly to a victim, or by directing them to a website where personal information is requested.

Fake job offers tend to target overseas individuals, as they ask for money to be sent to them for UK visa purposes. Forest Avenue never requests payments details in association with any job applications or any communication related to them. If in any doubt about the validity of a recruitment offer, please contact Human Resources, Forest Avenue (BE), Vlamingstraat 27, B-8560 Wevelgem.

Recent email award notifications have purported to be from Forest Avenue. Forest Avenue never requests payment details in association with competition winners or any communication related to them.

Forest Avenue advises that if you receive an email using Forest Avenue's name that asks for personal information or financial information and you have concerns about its authenticity, then please treat such emails with extreme caution.

Links to third party sites

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and Group companies. Forest Avenue is not responsible for the content of any websites that are linked to its site. When entering a third party site, it is your responsibility to ensure that you read the privacy notice and legal terms & conditions that apply to that site
Updates to this Privacy Notice

This Privacy Notice may be updated periodically. We will update the date at the top of this Privacy Notice accordingly and encourage you to check for changes to this Privacy Notice, which will be available on the Forest Avenue Online Content. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Notice, as required by applicable law.

Contact Us

Forest Avenue, Vlamingstraat 27, B-8560 Wevelgem, T. +32 56 41 06 17, info@forestavenue.be.