

11 JULY 2023

DATA PRIVACY POLICY

ECARX GLOBAL POLICY

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1. Introduction

1.1 Purpose

Personal Information (sometimes called Personal Data) is any information related to a real person, such as an employee, contractor, 3rd party representative and other individuals.

It may also include information about a browser or device used by one of these individuals.

ECARX recognizes that all people have fundamental privacy rights and freedoms and is committed to responsibly using Personal Information as reflected in the **Code of Conduct**.

The purpose of this policy is to help ECARX protect these rights and freedoms. It outlines the five key data privacy principles that should be applied by all employees, contractors and 3rd parties engaged by ECARX when collecting, handling, sharing or otherwise using Personal Information

This policy establishes company data privacy principles globally. However, privacy laws vary from country to country. Where local laws, regulations, or industry codes are more stringent than this policy, follow local requirements and in case of doubt reach out to the Legal / Privacy Team.

1.2 Scope & Applicability

1.2.1 Scope

The scope of this document is global.

1.2.2 Applicability

This policy applies to all employees, consultants, and contractors with access to ECARX systems as well as suppliers, business partners and other 3rd parties engaged by ECARX who are required to follow this policy.

1.3 Roles & Responsibilities

Roles	Responsibilities
All Employees	Must comply with this policy when handling Personal Information on behalf of ECARX
All consultants and contractors with access to ECARX systems	Must comply with this policy when handling Personal Information on behalf of ECARX
All Suppliers, Business Partners & 3 rd Parties engaged by ECARX	Must comply with this policy when handling Personal Information on behalf of ECARX

2. Principles to be Applied

All individuals collecting, handling, sharing or otherwise using Personal Information on behalf of ECARX and/or as part of executing job responsibilities, should apply the following Principles.

2.1 Be Transparent

Describe in clear and simple language what ECARX does with Personal Information and communicate this at an appropriate time.

2.1.1. Requirements

- a) Explain what Personal Information will be collected, who is collecting it, why it is being collected, how it will be used, and who it will be shared with
- b) Communicate this at the time Personal Information is collected (if possible) in a format that is easily accessible
- c) Being transparent may involve providing a link to an online ECARX privacy notice or on a local corporate website
- d) Consider whether it is appropriate (or required) to empower individuals with choices regarding what information they provide and how ECARX uses it

2.2 Collect Only When necessary

Collect the minimum necessary Personal Information to further a specific, and legitimate, business purpose

2.2.1. Requirements

- a) Identify the specific purpose(s) for collecting Personal Information
- b) Ensure Personal Information is collected only for such purposes.
- c) Consider whether the business purpose could be achieved with less Personal Information, and only collect the minimum data needed

2.3 Use Responsibly

Use Personal Information responsibly. This means that personal information should only be used in ways compatible with the purposes for which it was collected, and as communicated. This includes ensuring that the company only transfers such information across country borders where it is appropriate to do so.

2.3.1. Requirements

- a) Use Personal Information only in ways consistent with any notice presented
- b) Include appropriate data privacy protections in contracts where Personal Information will be handled by a third party
- c) When handling sensitive Personal Information, such as health data, recognize that enhanced data privacy protections may be needed

- d) Honour individuals' preferences and privacy requests, including to access, delete, or correct their Personal Information, subject to local laws and requirements.
- e) If local law allows transferring Personal Information across country borders, follow local requirements when transferring to third parties
- f) **Be aware of specific restrictions relating to the transfer of personal data between different jurisdictions. These include:-**
 - i. From ECARX in the European Economic Area (EEA) or United Kingdom (UK), to a location outside of the EEA;
 - ii. From Mainland China to a location outside of Mainland China
 - iii. From the State of California, USA to another US state or a Country outside of the USA

2.4 Protect and be vigilant

Follow applicable ECARX information security policies and guidelines. Be on the lookout and immediately report any unintended use or disclosure of Personal Information.

2.4.1. Requirements

- a) Classify Personal Information and store it according to the Company Information Security Management System
- b) Prevent Personal Information from unintended modification, use, or disclosure by complying with the company Information Security Management System policies and guidelines
- c) Keep Personal Information accurate and up to date
- d) Report any security incident or other unauthorized sharing, receipt, or handling of Personal Information

2.5 Retain for only as long as necessary

Collect Personal Information only for specific business needs. Once the Personal Information is not necessary, it should not be kept unless needed to comply with legal obligations

2.5.1. Requirements

- a) Follow company policies that provide guidelines on specific timeframes for maintaining Personal Information
- b) Delete Personal Information when no longer needed (unless otherwise required for legal reasons)
- c) In some situations, anonymization may be used as an alternative to deletion. Consult with ECARX Legal/Privacy if you would like to do this

3. Data Transfers Between Countries

Transfers of Personal Data can only occur between different jurisdictions where :-

- permitted by law **and**;
- ECARX has put in place the required Data Sharing Agreement (if applicable).

Before transferring personal data between different countries, please consult with ECARX Legal Department to confirm what Data Sharing Agreements are in place and the relevant Permissions.

4. Internal Controls

Internal controls for this document are stored in the ECARX Internal Control Register

5. Implementation

All ECARX offices in all ECARX jurisdictions must ensure that they have implemented all elements of this policy in an appropriate localised form and that they maintain the relevant internal controls and evidence.

6. Breach of this Policy

In alignment with our Code of Conduct, breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported to via ECARX SpeakUp

ECARX guarantees non- retaliation and confidentiality, to the extent legally possible, for good-faith reports of such breaches.

7. Definitions

Term	Definition
European Economic Area (EEA)	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway).
Personal Information	Any information related to a real person such as an ECARX employee and other individuals. It may also include information about a browser or device used by one of these individuals.
Data Sharing Agreement	A legal agreement made between two ECARX Companies in different jurisdictions, in accordance with all applicable laws to enable specified categories of data to be transferred from an ECARX office in one country to an ECARX office in another country.

8. Policy Review

This Policy shall be reviewed at least once every two years in accordance with revisions to the Code of Conduct or earlier where legislative or regulatory changes require its review.

9. Referenced Documents

Document
ECARX Code of Conduct
ECARX Speak Up Policy

10. Document Owner

This document is owned by Global Legal & Privacy

11. Document History

Version	Approved Date	Effective Date	Change	Next Revision Date
1.0	11 July 2023	30 September 2023	None – First Issue	11 July 2025