

CONFIDENTIAL

 ULTRAVIOLETTE



WEBSITE PRIVACY NOTICE v1.0

EUROPEAN UNION GENERAL DATA PROTECTION REGULATION

1. ULTRAVIOLETTE AUTOMOTIVE PRIVACY COMMITMENT

At Ultraviolette Automotive (“Ultraviolette”), we are committed to protecting your privacy and ensuring the security of your personal data. As the data controller, we collect, process, and store your information in compliance with applicable data protection laws, including the General Data Protection Regulation (“GDPR”), where applicable.

This Privacy Notice applies to personal data collected through our website (<https://www.ultraviolette.com/>), the UV Companion App, and related services. It outlines how we collect, use, and protect your data.

By using our services, you consent to the practices described in this policy. For privacy-related inquiries, contact us at privacy@ultraviolette.com.

2. INFORMATION WE COLLECT

We collect personal data directly from users, through interactions with our Services, and from third-party sources where applicable. The data collected is limited to what is necessary to fulfil specific business functions, such as account management, service provision, and compliance with legal obligations.

Our collection of personal data covers four key categories:

- a. Information from or about you;
- b. Information from or about your Ultraviolette vehicle;
- c. Information from or about your use of Services (including the UV mobile application, website, and related Services);
- d. Information from Third parties.

[Depending on the products and Services you engage with, not all categories may be applicable to you].

2.1 INFORMATION FROM OR ABOUT YOU

We collect personal data directly from you when you interact with us, such as when you visit our website, register an account, make a purchase, communicate with customer support, or engage with our marketing communications.

Category	Types of Data Collected	Purpose of Collection	Legal Basis
Contact Information	Full name, address, email, phone number, communication preferences	To communicate with you, manage customer relationships, booking a test ride and process Service requests.	Performance of a contract; Consent; Legitimate interests
Account and Registration Data	Login credentials, customer ID, account settings, and profile information	To create and manage your account, enable app functionalities, and personalize your experience	Performance of a contract; Legitimate interests
Purchase and Transaction Data	Order details, transaction history, pricing information (excluding sensitive payment data)	To process orders, facilitate delivery, handle returns, and comply with accounting obligations	Performance of a contract; Legal obligation
Marketing Preferences	Opt-in status, engagement metrics (e.g., email opens, clicks)	To provide tailored promotional content and offers	Consent; Legitimate interests
Customer Support Data	Inquiry details, support tickets, communication logs	To resolve your inquiries and improve our support Services	Performance of a contract; Legitimate interests

2.2 INFORMATION FROM OR ABOUT YOUR ULTRAVIOLETTE VEHICLE

Your Ultraviolette vehicle generates data that supports key features, ensures safety, and improves vehicle performance. To safeguard your privacy, this data is collected and processed in accordance with the principles of data minimization and necessity.

Category	Types of Data Collected	Purpose of Collection	Legal Basis
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Vehicle Identification Data	Vehicle Identification Number (VIN), license plate number, firmware version	To register vehicles, provide warranty Services, and manage repair histories	Performance of a contract; Legal obligation
Vehicle Usage Data	Ride history, odometer readings, throttle usage, ride modes	To improve vehicle performance, provide usage insights, and conduct analytics	Legitimate interests; Performance of a contract
Diagnostic and Maintenance Data	Battery status, cell temperatures, firmware updates, error codes	To provide predictive maintenance, troubleshoot issues, and enhance safety	Legitimate interests; Performance of a contract; Legal obligation
Charging Information	Charging patterns, battery charge levels, charging station locations	To improve charging Services and battery efficiency	Legitimate interests; Performance of a contract
Telematics Data	Real-time location, speed, acceleration, braking patterns	To enable navigation Services, provide safety alerts, and improve product features	Consent; Performance of a contract; Legitimate interests

2.3 INFORMATION FROM OR ABOUT YOUR USE OF ULTRAVIOLETTE SERVICES

We collect data automatically when you use the Ultraviolette website, UV mobile application, or other digital platforms to improve functionality, enhance security, and tailor content to your preferences.

Category	Types of Data Collected	Purpose of Collection	Legal Basis
Device Information	Device type, operating system, browser type, IP address, device identifiers (e.g., IMEI)	To ensure compatibility, monitor technical performance, and secure user accounts	Legitimate interests; Consent (for certain tracking technologies)

Usage Data	Session durations, page visits, app interactions, clickstream data	To analyze user behaviour, improve Service delivery, and optimize user interfaces	Legitimate interests; Consent
Cookies and Similar Technologies	Cookies, pixel tags, web beacons	To personalize content, measure marketing effectiveness, and provide essential website functions	Consent; Legitimate interests
Location Data	GPS data, saved locations, search history	To provide location-based Services, enable ride tracking, and improve navigation accuracy	Consent; Performance of a contract

2.4 INFORMATION FROM THIRD PARTIES

We may receive personal data from authorized distributors, Service partners, payment processors, and marketing affiliates. These third-party data exchanges are governed by contractual obligations to ensure compliance with GDPR and other applicable data protection laws.

Source	Types of Data Received	Purpose of Collection	Legal Basis
Distributors and Dealers	Customer details, purchase information, and Service requests	To fulfil product orders, manage warranties, and coordinate repairs	Performance of a contract; Legitimate interests
CRM and Customer Support Platforms	Support tickets, interaction history	To enhance customer Service and resolve issues promptly	Performance of a contract; Legitimate interests
Marketing Partners	Engagement metrics, marketing preferences	To improve promotional strategies and personalize content	Consent; Legitimate interests

Payment Processors	Payment status, transaction confirmations (excluding card details)	To process orders and handle financial reporting	Performance of a contract; Legal obligation
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2.5 DATA MINIMIZATION AND RETENTION

We collect only necessary data, ensuring legal compliance and privacy. Sensitive data is anonymized or processed locally. Location data is shared only with consent. Interactions are encrypted and securely stored. Manage data preferences via the UV app. Limiting sharing may affect features but not safety.

3. LEGAL GROUNDS FOR PROCESSING

Personal data is processed lawfully based on valid legal grounds, including consent (e.g., marketing, withdrawable anytime), contractual obligations (e.g., orders, support), legal compliance (e.g., tax, records), vital interests (e.g., emergencies), public interest, or legitimate interests (e.g., security, service improvements). We uphold these principles while safeguarding your rights. For privacy inquiries, mail us at privacy@ultraviolette.com.

4. HOW WE USE YOUR DATA

Ultraviolette processes personal data to provide and improve Services, ensure security, prevent fraud, and comply with legal requirements. Data use depends on the Services accessed, including account management, support, and essential communications. Payments are handled by trusted third parties. With consent, data may be used for marketing. Analytics help enhance user experience while adhering to necessity, proportionality, and limitation principles.

5. YOUR INFORMATION SHARED WITH OTHERS

We may share your personal data with trusted partners, third parties, and service providers, including affiliates and vendors engaged to provide services on our behalf. These entities are authorized to process your data strictly in accordance with our instructions and applicable data protection laws. We require all third parties to implement appropriate technical and organizational measures to safeguard your personal data. Your information will never be disclosed to any third party for purposes beyond those outlined in this notice.

Ultraviolette operates globally, and your personal data may be transferred, stored, or processed outside your local jurisdiction, including countries beyond the European Economic Area (EEA). Where such transfers occur, we ensure compliance with applicable data protection laws, including the GDPR, by implementing appropriate safeguards

- **Data Transfers:** Transfers outside the EU comply with GDPR via consent (Article 49(1)(a)) or appropriate safeguards. Intra-group transfers follow Binding Corporate Rules (BCRs) for consistent protection.
- **Third-party Access:** Select service providers outside the EU may process data with strict safeguards, including Standard Contractual Clauses (SCCs) and supplementary measures.
- For regions without an EU adequacy decision, we implement additional protections to maintain GDPR compliance.

6. SECURITY MEASURES TO PROTECT YOUR DATA

Ultraviolette implements robust technical and organizational measures to protect your personal data from unauthorized access, misuse, accidental loss, destruction, or alteration. We continuously invest in security technologies and best practices to maintain the confidentiality and integrity of your data. Additionally, when working with third-party vendors, we ensure they adhere to the same high security standards as Ultraviolette.

Regardless of where personal data is stored or processed, Ultraviolette enforces comprehensive security controls, including encryption protocols, strict access management, data anonymization where applicable, and regular security assessments. Our security framework also includes proactive monitoring to detect and respond to threats swiftly.

In the event of a security incident, we have a structured response plan in place to contain risks, recover affected data, and mitigate potential harm. Where required, we notify the appropriate regulatory authorities and impacted individuals in accordance with applicable data protection laws. If you suspect any misuse, unauthorized access, or loss of personal data, please contact Ultraviolette Automotive immediately at privacy@ultraviolette.com.

7. DATA SUBJECT RIGHTS

Ensuring the protection and privacy of your personal information is fundamental to our commitment. Under data protection laws, you have specific rights regarding your data. This section details these rights and explains how you can exercise them.

Under the EU General Data Protection Regulation (GDPR), individuals are granted with the following rights:

1. **Right to access:** Data Subjects can view and request copies of their Personal Data.
2. **Right to rectification:** Data Subjects can request that inaccurate or outdated Personal Data be updated or corrected.
3. **Right to erasure:** Also known as the "right to be forgotten", Data Subjects can request that their Personal Data be deleted.
4. **Right to restrict processing:** Data Subjects can restrict how their Personal Data is processed.
5. **Right to data portability:** Data Subjects can have their Personal Data moved to another party.
6. **Right to object:** Data Subjects can object to how their Personal Data is processed.
7. **Right to be informed:** Data Subjects have the right to be informed about how their Personal Data is being processed.
8. **Right not to be subject to automated processing:** Data Subjects have the right not to be subject to a decision based solely on automated processing.

You have rights under GDPR, including rectification and erasure, which you can manage via your account. To unsubscribe from marketing emails, use the "Unsubscribe" checkbox.

For other Data Subject Requests, contact us via email at privacy@ultraviolette.com. A representative may act on your behalf with proof of authorization.

To verify your identity, we may request confirmation details or additional documentation, used solely for security and fraud prevention.

8. HOW WE USE COOKIES

When you visit our website (<https://www.ultraviolette.com/>) we collect cookies that may be placed on your computer, mobile device, or tablet. It could contain the following data (but not limited to):

- information about the browser;
- an identifier, in the form of a unique number;

- an expiration date (some cookies only).

For more information, please refer to our [Cookie Policy](#)

9. COLLECTION OF PERSONAL DATA OF CHILDREN

We do not knowingly collect personal information from minors under the age of 16. If we become aware that anyone under the age of 16 has submitted personal information to us via our website, we will delete that information and will not use it for any purpose whatsoever. If you believe that someone under the age of 18 has submitted personal information to us via the website, please contact us at privacy@ultraviolette.com. We encourage parents and legal guardians to talk with their children about the potential risks of providing personal information over the Internet.

10. CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to update or modify this Privacy Statement at any time. In the event of any changes, we will post the updated notice prominently on this site and in other relevant locations to ensure you are always informed about the data we collect, how we use it, and the circumstances under which we may disclose it. If the changes are material, we will notify you via a notice on this site. We will continue to use your data in accordance with the Privacy Notice under which it was collected, while periodically reviewing our operations and business practices to ensure compliance with corporate policies and procedures regarding data confidentiality.

11. CONTACT US

If you have questions or complaints regarding this Policy or the use of our Services, you may contact us via email at privacy@ultraviolette.com.