

# SDLC PRIVACY POLICY

## INTRODUCTION

The SDLC is committed to protecting your personal data. We are transparent about the limited personal data we collect, why we collect it, and how it is managed and shared. The SDLC is compliant with the EU General Data Protection Regulation.

By registering with the SDLC, and by using the SDLC website, you agree to the terms of the SDLC Privacy Policy.

## SMARTDEVICELINK CONSORTIUM, INC. ("SDLC")

The SDLC is an open source community made up of OEMs, suppliers, Application Developers, and others, focused on making SDL the industry standard for in-vehicle application connectivity. The SDLC administers smartdevicelink.com in support of this community. Our website contains specifications, developer guides and other documentation pertaining to SmartDeviceLink technology. Registrants of the SDLC website may submit personal data on our website to obtain and share information related to SDL.

Communications regarding this policy should be directed to our Data Protection Officer ("DPO"):

Attention: SDLC Data Protection Officer  
332 E. Lincoln Avenue, Suite 200  
Royal Oak, MI 48067.  
[DPO@smartdevicelink.com](mailto:DPO@smartdevicelink.com).

## WHAT PERSONAL DATA DO WE COLLECT AND WHY?

Registrants to the SDLC website provide basic contact information, including name, email address and company information. The SDLC uses this information to facilitate communication between Application Developers and AEMs about registered software applications. The SDLC does not use this information for marketing purposes.

An interested party may provide an email address to receive a newsletter from the SDLC.

The SDLC website includes links to third-party websites, chat rooms, message boards, or other public online forums. When you disclose information at these public forums, it may be viewed, collected and used by others. The SDLC does not monitor or administer these public forums, and they are not bound by this Privacy Policy.

## HOW DOES THE SDLC USE YOUR PERSONAL DATA?

The SDLC uses your personal data in a limited fashion, only to:

- Create your user profile
- Contact you during your development efforts or application submission
- Facilitate communication between AEMs and Application Developers
- Register applications
- Generate site analytics that improve our site layout, content, product offerings and services
- Provide you with important information about the SDLC
- Comply with legal requirements

Approved: June 14, 2018

## CONSENT TO COLLECTION AND USE OF YOUR PERSONAL DATA

When you register with the SDLC, and provide your personal data, you consent to the collection, use, processing, transfer, and disclosure of your personal and non-personal data, globally, in accordance with this Privacy Policy. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the purposes stated in our Privacy Policy.

You may withdraw your consent by sending a request for deletion of your personal data to the Data Protection Officer at the contact information provided above.

## WHERE IS YOUR INFORMATION SHARED?

Application Developers who register with the SDLC select the AEMs with whom to share their personal data. Conversely, personal data associated with a selected AEM is shared with Application Developers who select that AEM during the registration process. The SDLC has no control over whether or how each party shares personal data of the other. Registrants are encouraged to inquire about the privacy policy of any party with whom you share personal data.

The SDLC's project maintainer, vendors, subcontractors and agents ("Service Provider" or "SP") have access to your personal data to administer the website and provide support the SDL open source project. They are contractually obligated to keep your personal data confidential.

Beyond this, the SDLC will disclose personal data, without notice, only in limited circumstances, when necessary to: (a) conform to the edicts of the law or comply with legal process served on the SDLC, its affiliates or the site; (b) protect and defend the rights or property of the SDLC, its affiliates or this site; or (c) act under exigent circumstances to protect the personal safety of the SDLC or affiliate personnel, users of their websites, or the public; or (2) if required to do so by law.

Site metrics for smartdevicelink.com may also be shared with the SDLC members. The information shared will be aggregate data and will not include personal data.

## ACCESS TO AND CONTROL OVER YOUR INFORMATION.

Registrants may correct or update their personal data on their profile page at smartdevicelink.com.

Registrants may contact the SDLC DPO to request a copy of their information, make updates or request restriction or deletion of personal information.

The SDLC intends to retain personal data only so long as necessary to carry out the SDLC's business activities. Application Developers, AEMs and others who submit Personal Data to the SDLC are required to notify the SDLC DPO in the event they cease to be active with the SDLC, or if they otherwise want their Personal Data deleted.

If you are in the European Union and wish to raise a concern about the processing of your information, you have the right to lodge a complaint with a supervisory authority pursuant to the EU General Data Protection Regulation.

## YOUR INFORMATION IS SECURE.

During the registration process, your personal data provided to the SDLC is securely transmitted using SHA-256 with RSA encryption via HTTPS. Personal data is then stored at SDLC using AES-256 encryption. AEMs to whom

Approved: June 14, 2018

Application Developers designate to share their personal data hold a valid public/private key, provided by SDLC, to access the information.

#### CHILDREN (UNDER 16 YEARS OF AGE).

The SDLC does not knowingly collect personal data from children under 16 years of age. If a child has provided us with personal data, a parent or guardian of that child may contact our DPO to have this information deleted from our records.

#### WHAT NON-PERSONAL DATA DO WE COLLECT?

We collect non-personal data on an individual and aggregate (or anonymous) basis that includes all site visitors.

Non-Personal data collected on smartdevicelink.com may be used to:

- Compile aggregate and statistical data to improve our website and the user experience
- Perform analytics on the user's experience while visiting this site on an aggregate level that does not identify you or your information personally

This collection may involve the use of a third-party vendor acting on behalf of smartdevicelink.com, as described below. Third-party vendors with which SDLC has entered into contracts to perform site analytics and which are provided aggregate information are to use that information only to perform those services, and they may not share or resell this information

Cookies. To enhance the performance and functionality of our site, we use session, persistent and third-party "cookies" that store a small text file on your computer and collect certain information about your visit to our site.

A "session" cookie is stored only in your computer's working memory (RAM) and only lasts for your browsing session. When you close all your browser's windows, or when you shut down your computer, the session cookie disappears forever.

A "persistent" cookie is stored on your computer's hard drive until a specified date, which could be tomorrow, next week, or 10 years from now. Persistent cookies stay on your computer until either a) they expire, b) they are overwritten with newer cookies, or c) you manually remove them. Most browsers can be configured not to accept cookies, however, this may prevent you from having access to some site functions or features.

#### Other tracking technologies.

We may use third-party click tracking analytics tools (such as DART, Omniture tags, DoubleClick, Efficient Frontier, and Google Analytics) to capture clickthrough statistics.

The SDLC may use spotlight ads/web beacons/GIF/pixel tags which are site instrumentation tools that help us to determine, for instance, whether a page has been viewed or not and, if so, how many times. Emails or electronic newsletters we send may use tools (e.g., pixel tags or web beacons) to gather email metrics and information to improve the reader's experience such as how many of the emails are opened, if they were printed or forwarded, the type of device (e.g., mobile or PC) from which they were opened, and the city, state, and county associated with the applicable IP address. In general, any electronic image viewed as part of a webpage, including an ad banner, can act as a web beacon.

Approved: June 14, 2018

When you visit our website the server housing the pages automatically generates a “session log.” We use session logs to help us determine how people travel through our site. In this way, we can structure our pages so that the information most frequently visited is easier to find. By tracking page visits, we can also determine if the information we’re providing is being used. The only data gathered is the Internet Protocol (IP) address from which you came, the website that referred you, the pages you visited and the date and time of those visits.

Users may be directed to smartdevicelink.com via banner ads or site links. Ads or site links that are placed by smartdevicelink.com use cookies or web beacons to deliver metrics on the effectiveness of the ads or links. They do not collect personal data from the user.

#### NO INFORMATION SHARING FOR MARKETING PURPOSES

The SDLC does not share your Personal Data with third-parties for marketing purposes. As explained above, Application Developers select the AEMs with whom to share their personal data. The SDLC has no knowledge of, or control over, how the AEMs you have selected use or share your personal data.

#### MODIFICATIONS TO THIS POLICY.

Occasionally, the SDLC may update this Privacy Policy to reflect changes to our website or privacy practices, or to comply with new laws and regulations. The SDLC may modify, add or remove portions of this Privacy Policy at any time. Where such changes are material, the SDLC will provide additional notice via email or notification on its website.