

## Online Privacy Policy

[This Online Privacy Policy (the “**Policy**”) applies to the MyWay consumer website located at <https://myway.goodyear.com/> (the “**Website**”).

### **MyWay Commitment to Privacy**

The MyWay Tire & Rubber Company and its affiliates respect individual privacy and values the confidence of the visitors of our websites, our customers, vendors and others with whom we do business. We strive to process personal data (as further defined below) in a manner consistent with the laws of the countries in which we do business. In the European Union, this includes as from May 25, 2018, the General Data Protection Regulation (the “**GDPR**”)<sup>1</sup>.

Whenever you visit our Website, <https://myway.goodyear.com/> (hereafter also “**MyWay**” or “**we**”) will process personal data about you (as further defined below). In that context, MyWay will act as a controller, i.e. the person responsible for the processing of your personal data, as it decides why and how your personal data is processed.

The purpose of this Policy is to inform you and explain in all transparency:

- why and how MyWay collects, processes and stores your personal data;
- what its role as “controller” of your personal data involves; and
- what your rights and our obligations are in relation to this processing.

### **Definitions**

For purposes of this Policy, the following definitions shall apply:

“**personal data**” means any information relating to an identified or identifiable natural person<sup>2</sup>;

“**processing**” shall mean any operation or set of operations that is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction and the verb “**to process**” shall be construed accordingly; and

“**processor**” means a natural or legal person which processes personal data on behalf of the controller. MyWay’s processors may be subsidiaries, affiliates or third-party suppliers and service providers. In all cases, MyWay will conclude a data processing agreement with its processor to ensure your personal data is processed in accordance with the GDPR.

### **Information Collection**

#### **Method of collection**

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<sup>1</sup> Regulation 2016/679 of the EU Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

<sup>2</sup> An identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

When you browse the Website, some personal data is collected simply as a result of your browsing. Some functions of our Website, however, may request that you voluntarily supply MyWay with additional personal data.

### **Categories of personal data collected**

We collect the following information from website visitors:

- your IP address;
- the domain of your internet service provider;
- the type and version of your browser, your operating system and platform;
- information regarding the pages visited, the information researched, the time spent on the Website and other statistics;
- information regarding your habits and preferences;

If you wish to have access to or benefit from certain features of our Website, we may also request you to provide the following additional information:

- basic identification information (such as your name, post/email address and phone number);
- content of contact forms you complete via the Website;
- financial information (such as bank account details);
- online tire warranty registration information and reference numbers;
- car identification information (including the license plate, to the extent permitted under applicable law);
- login details; and
- other information relevant to any survey that we may run in relation to your use of the Website.

Please note that in some countries, car identification information may also be obtained from publicly accessible sources to which we have access to link the license plate with the car identification information.

Payment processing, including debit and credit card payment processing, is performed by third party service providers and MyWay does not process or store your credit or debit card information in connection with transactions occurring through the Website.

### **Consequences of a refusal to provide personal data**

You are not subject to any legal obligation to provide MyWay with your personal data. Please note however that, in certain circumstances, your refusal to provide personal data or to accept cookies or browser setting may affect your browsing experience and prevent you from using certain features on our Website.

Therefore, whenever personal data is collected (e.g. in forms), we will indicate whether the provision of such data is mandatory (e.g. with an asterisk) and the consequences of a refusal to provide the requested data.

### **Cookies and other similar technology**

Our Website may use "cookies" or "web beacons." A "cookie" is a text file which may be placed on your computer, device or system when visiting our Website. Cookies allow MyWay to better serve visitors to the Website by offering a tailored experience. It contains information that is collected from your device and sent back to the Website on each subsequent visit to remember your actions and

preferences over time. The information collected does not contain your name, address, telephone number or email address.

Please refer to our [https://www.goodyear.eu/en\\_gb/consumer/cookie-policy.html](https://www.goodyear.eu/en_gb/consumer/cookie-policy.html) for further information on how we use cookies.

## **Security**

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, MyWay takes appropriate precautions to protect personal data in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, and to respond to the misuse, loss or unauthorized use of such personal data.

Information MyWay collects may be stored on third party data storage systems (see section “Third-Party Recipients” below). In those instances, MyWay also requires those third parties to employ security practices and systems to ensure the security of the information.

## **Purposes and legal basis of the processing**

### **Purposes of the processing**

MyWay and processors acting on MyWay's behalf use the personal data you give to MyWay for the following purposes:

- User registration and management (such as account management and answering of questions)
- Processing, recording, and tracking of your purchases, payments, returns, warranty or rebates
- Ordering products or services
- Measuring the usage of our Website (including preparation of usage statistics)
- Periodically sending promotional emails about our products, special offers and information which you or the company for which you work may find interesting, using the email address you provided (if any)
- Inviting your participation in online surveys
- Requesting feedback on products and services
- Improving our Website
- Communicating with you in response to a request received from you

Online tire warranty registration information provided by you will not be used for marketing purposes.

### **Legal basis of the processing**

We are not allowed to process personal data if we do not have a valid legal ground. Therefore, we will only process personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations (e.g. tax or accounting requirements); or
- the processing is necessary for the legitimate interests of MyWay and does not unduly affect your interests or fundamental rights and freedoms. Please note that, when processing your personal data on this basis, we always seek to maintain a balance between our legitimate interest and your privacy.

Examples of such 'legitimate interests' are:

- to benefit from cost-effective services (e.g. we may decide to use certain platforms offered by external suppliers to process data);
- to offer our products and services to our customers or prospective customers
- to better manage and administer the relationships with our customers and their data;
- to improve the quality of services to our customers by taking into account their preferences in terms of means of communication (phone, e-mail, etc.) and frequency;
- to measure our customers' interest in MyWay products and gain a better understanding of customer interaction with the marketing emails, including by performing statistical and other research and analysis of data with respect to the status of the emails (not delivered, delivered, opened);
- to enable MyWay to offer advertising and offers tailored to its customers so that MyWay can market its products better;
- to sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case personal data could form part of one of the assets we sell;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks; and
- to meet our corporate and social responsibility objectives;

### **Third-party recipients**

We may transfer personal data to our members of personnel (to the extent they need it to perform their tasks) and other companies of the MyWay group. Such other group companies will either act as another controller (in which case you will be separately informed about this processing) or only process personal data on behalf and upon request of the controller (thereby acting as a processor).

In addition, we may also transfer your personal data to third party processors outside the MyWay group to complete the purposes listed above, to the extent they need it to carry out the instructions we have given to them.

Such third-party processors include:

- our (IT) service providers, cloud service providers and database providers;
- our consultants, suppliers and service providers which assist MyWay in promoting and marketing its products and services; store and analyze the personal data; conduct user and consumer ratings, reviews and surveys; communicate with you on MyWay's behalf; and process and fulfil transactions, including tire purchases and installations and/or other vehicle services; and as otherwise necessary to provide promotional communications or services to Website users and customers.

Your personal data may also be disclosed to:

- any third party to whom we transfer any of our rights or obligations under a relevant agreement;
- any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request; and
- any central or local government department and other statutory or public bodies.

Any information provided by users through the online tire warranty registration form available on this Website will not be shared with any third party other than as provided by law.

## **Cross border data transfers**

The personal data transferred within or outside MyWay, may also be processed in a country outside the European Economic Area, which includes the EU Member States, Iceland, Liechtenstein and Norway (the "EEA").

If your personal data is transferred outside the EEA, we will enter into EU standard contractual clauses approved by the European Commission prior to such transfer to ensure the required level of protection for the transferred personal data. You may request additional information in this respect and obtain a copy of the relevant safeguard put in place by exercising your rights as set out below (see section "Your rights").

## **Data retention**

MyWay will only retain your personal data for [a period of 3 months after [your last visit of our Website].

However, if individuals wish to have their personal data removed from our databases before such time, they can make a request thereto as described below.

## **Your rights**

You have a right of access to your personal data as processed by MyWay under this Policy. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction thereof. MyWay will promptly correct any such information.

You also have the right to:

- request the erasure of your personal data;
- request the restriction of the processing of your personal data;
- withdraw your consent where MyWay obtained your consent to process personal data (without this withdrawal affecting the lawfulness of processing prior to the withdrawal);
- object to the processing of your personal data for direct marketing purposes; or
- object to the processing of your personal data for other purposes in certain cases where MyWay processes your personal data on another legal basis than your consent,

and MyWay will honour such requests, withdrawal or objection as required under the applicable data protection rules.

In addition, you also have the right to data portability. This is the right to obtain the personal data you have provided to MyWay in a structured, commonly used and machine-readable format and to request the transmission of such personal data to a third party, without hindrance from MyWay and subject to your own confidentiality obligations.

To exercise the above rights, please send an email to [customerservice@goodyear.com](mailto:customerservice@goodyear.com), with a recto-verso scan/copy of your identity card or passport for identification purpose.

If you do not want to receive email or other communications from MyWay, please adjust your communications preferences by sending an email to [customerservice@goodyear.com](mailto:customerservice@goodyear.com). MyWay will address all requests to remove names from any postal mail or email lists in compliance with applicable data protection laws.

If you have any questions or are not satisfied with how MyWay processes your personal data, please let us know by sending a message to Goodyear Dunlop Tyres UK Ltd, 2920 Trident Court, Solihull Parkway, Birmingham Business Park, Birmingham B37 7YN or by e-mail at [customerservice@goodyear.com](mailto:customerservice@goodyear.com). We will examine your question of complaint and get back to you as soon as possible.

You also always have the right to file a complaint with the competent data protection authority.

### **Other websites**

The Website may contain links to non-MyWay websites, and we make every effort to link only to websites that share our high standards and respect for privacy. However, MyWay is not responsible for the content of or the privacy practices employed by non-MyWay websites.

### **Children**

MyWay does not knowingly collect, use or disclose any personal data (such as name, address and telephone number) from children under 16 years of age through any Website without obtaining prior consent from a parent or legal guardian. MyWay does not allow children under 16 to register for or participate in contests or promotions on this Website. However, if the parent or guardian of a child under 16 believes that his or her child has provided MyWay with personal data, that parent or guardian should contact MyWay if they want this information deleted from MyWay's systems. If MyWay obtains knowledge that it has personal data about a child under 16 in retrievable form in its files MyWay will delete that information from existing files.

In addition, anyone under 16 years of age should seek his or her parent's or guardian's permission prior to using or disclosing any personal data on this Website.

### **Updates to this Policy**

Any future updates to the processing of your personal data as described in this Policy will be notified to you in advance through our Website (via a pop-up or otherwise) as well as through our other usual communication channels (e.g. by email, if available).