

Privacy Notice

Revised January 13, 2020

At Predictive Strategies, Inc., (“we,” “us,” or “our”) protecting your privacy is fundamental to our business. We are committed to safeguarding your information and to explaining how we collect, use, and disclose your Personal Information related to your use of safeairbags.com and predictivestrategies.com (the “Websites”). Further, this Privacy Notice (the “Notice”) is intended to comply with all applicable data-privacy laws, including but not limited to the California Consumer Privacy Act of 2018 (the “CCPA”).

Definitions

Personal Information means information about an individual who can be identified from use of that information (or from that information when combined with other information in our possession or likely to come into our possession), including information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Types of personal information typically include names, physical addresses, mailing addresses, social security numbers, email addresses, phone numbers, bank account numbers and driver’s license numbers. But Personal Information may also include other information that can reasonably link to a particular person, such as internet protocol (IP) addresses, unique device identification numbers, employment information, and internet activity. Personal Information does *not* include publicly available information from government records; de-identified or aggregated consumer information; or for purposes of this Notice, information specifically excluded from or by applicable data-privacy laws, such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), and the Driver’s Privacy Protection Act of 1994.

Usage Data is data collected automatically that is either generated by your use of the Website or from the Website infrastructure itself (for example, the duration of your visit to a web page).

Cookies and *Pixels* are small data files that are placed on your computer or mobile device when you visit a website (cookies) and snippets of code that track use behavior on a website (pixels). Cookies and Pixels are used, for example, to make websites work or to make them work more efficiently. Cookies and Pixels can also provide reporting information to track how a user interacts with a website.

Collection and Use of Personal Information

When you visit our Websites, we may ask you to provide us certain Personal Information. Other Personal Information may automatically be collected by our Websites. Further, we collect information from other sources and combine that with information we collect directly. We do, however, limit our collection of Personal Information to information that we may use to perform the services described on our Websites, which includes providing you with information related to the Takata Airbag Recall campaign. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or

incompatible purposes without providing you notice. We currently collect the following categories of Personal Information from the sources and for the purposes indicated below:

Category of Information	Categories of Sources	Purpose
Personal Identifiers, including your real name, your physical address, your email address, your IP address, and demographic information.	Directly from you through your use of our Websites and from consumer data resellers.	To contact you for purposes of engaging in the Takata Airbag Recall campaign.
Commercial Information, including the VIN and make and model of your vehicle.	Directly from you through your use of our Websites, from consumer data resellers, and from automobile original equipment manufacturers.	To determine whether your vehicle is subject to the Takata Airbag Recall.
Internet Activity, including your interaction with the Websites, the type of browser you use, access times, and pages viewed.	Directly from you through your use of our Websites, generally through use of Cookies and Pixels as discussed further below.	To improve the Websites and present their contents to you.
Inferences Drawn from such information, including your preferences, characteristics, psychological trends, predispositions, and behavior that may help us improve the effectiveness of our safety-awareness campaign.	From consumer data resellers.	To improve the effectiveness of the Takata Airbag Recall campaign.

Cookies and Pixels

We use cookies and pixels to track your activity on the Websites and to hold certain information. You can instruct your browser to refuse all cookies and pixels or to indicate when a cookie or pixel is being used. However, if you do not accept cookies and pixels for the Websites, you may not be able to use some portions of the Websites.

Non-Personal Information

This Notice does not restrict our collection, use, or disclosure of any aggregated information or information that does not identify, or cannot be reasonably linked to, any individual.

Disclosure and Sharing of Personal Information with Service Providers

We may disclose Personal Information we collect from you or from the categories of sources described above: (1) to our subsidiaries and affiliates; (2) to contractors, service providers, and other third parties we use to support our business; (3) to fulfill the purpose for which you provide it; (4) to a buyer or other successor in the event of a sale or transfer of some or all of our business or assets; (5) for any other purpose disclosed by us when you provide the information; (6) to comply with any court order, law, or legal process, including responding to any government or

regulatory request; (7) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our clients, or others; or (8) for additional purposes with your consent. We do not sell or otherwise share personal information with third parties for direct marketing purposes. And when we do share your information with our service providers, they are contractually prohibited from retaining, using, or disclosing your Personal Information for any purpose other than that specified in the contract.

To provide you with the Websites services, for example, to provide you with recall information related to your vehicle, we must communicate with our third-party providers. These third parties may also have privacy policies that differ from ours. For example, they may collect personal information about your online activities over time and across different websites and other online services, and they may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third-parties or their privacy practices, and this Notice does not apply to any third-party website or service you may access through our website. If you have any questions about a third-party provider’s privacy policies or advertising, you should contact the responsible provider directly.

The information we collect is currently shared with the following categories of providers for the purposes set forth below:

<u>Category of Information</u>	<u>Provider Category</u>	<u>Purpose</u>
Personal Identifiers, including your real name, your physical address, your email address, your IP address, and demographic information.	Data analytics providers, our call center partners, and our mailing partners.	To confirm and append the data we collect, to improve the quality of our safety-awareness campaign, and to effectuate the Takata Airbag Recall campaign.
Commercial Information, including the VIN and make and model of your vehicle.	Vehicle data providers.	To provide the Websites’ services.
Internet Activity, including your interaction with the Websites, the type of browser you use, access times, and pages viewed.	Website analytics providers.	To improve the Websites and present their contents to you.
Inferences Drawn from such information, including your preferences, characteristics, psychological trends, predispositions, and behavior that may help us improve the effectiveness of our safety-awareness campaign.	Data analytics providers.	To confirm and append the data we collect to improve the quality of our safety-awareness campaign.

Retention of Information

We will retain your Personal Information only for as long as is necessary for the purposes set forth herein. However, we may retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will retain your Usage Data for internal analysis purposes. Usage Data is generally retained for approximately 24 months, except when this data is used to strengthen the security or to improve the functionality of our Websites or if we are legally obligated to retain this data for longer time periods.

Data Processing

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction, where data protection laws may differ than those from your jurisdiction.

If you are located outside of the United States and choose to use the Website, please note that we transfer the data, including Personal Data, to the United States and process it there. Your consent to this Privacy Notice followed by your use of the Website represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice and that no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Data Security

We have implemented measures designed to secure your information from accidental loss and from unauthorized access and disclosure. The use of, and access to, your Personal Information by us is restricted to employees and contractors who need to know that information to provide services to you. We maintain physical, electronic, and procedural safeguards to limit access to your Personal Information. Unfortunately, transmission of information via the Internet is not completely secure. Although we do our best to protect all information submitted to our Website, we cannot guarantee the security of any such information. Any electronic transmission of information, including your Vehicle Identification Number, is at your own risk.

Changes to our Privacy Notice

We will post any changes we make to this Privacy Notice on our website. If we make material changes to how we treat Personal Information we collect from you, we will notify you on our website homepage. The date this Privacy Notice was last revised is identified above.

California Consumer Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. If you are a consumer under the CCPA, this section describes your rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Although that information is set forth in this Privacy Notice, once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you;
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 248-243-8569
- Emailing us at privacy@predictivestrategies.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, including at least your name and either your physical address or your email address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create any sort of account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

Within 10 days of your request, we will confirm receipt of your request and provide you with information about how we will process your request, including our verification process and when you can expect a complete response to your request. In any case, we will attempt to respond to a verifiable consumer request within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response

by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the date of the request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Contact Information

If you have any questions or comments about this Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights, please contact us at:

Phone: 248-243-8569

Email: privacy@predictivestrategies.com

Physical Address: 39400 Woodward, Suite 190, Bloomfield Hills, MI 48304