

Global Data Privacy Policy

-Summary-

Purpose

The policy states Nissan's rules for protecting the privacy of Personal Data. Nissan believes that the processing of Personal Data in a compliant way is an important (legal) obligation and will also promote our corporate purpose – “driving innovation to enrich people's lives”. Therefore, the policy equally aims to protect the Personal Data of Nissan's customers, employees as well as third parties we are interacting with.

Policy

1. Privacy Principles

All Employees must always process Personal Data according to all applicable laws.

- a. **Justification:** Nissan can only process Personal Data lawfully, fairly, transparently and with an appropriate justification (legal grounds).
- b. **Purpose:** Personal Data can only be processed for legitimate purposes. Each purpose must be clearly explained to the Individual.
- c. **Minimization and accuracy:** Nissan must limit its processing of Personal Data to the minimum amount of necessary information . Nissan must also maintain the integrity of the Personal Data and keep the Personal Data accurate, complete and reliable.
- d. **Retention:** Personal Data can only be kept for as long as necessary for the relevant purpose and must thereafter be destroyed.
- e. **Individual rights:** Individuals have certain rights to access or have their Personal data transferred. Nissan will handle such requests according to applicable laws.
- f. **Data security and confidentiality:** Nissan will apply safeguards to ensure the security and confidentiality of Personal Data which includes processes to quickly communicate any security incidents.

- g. **Transfer of Personal Data:** Nissan may only share Personal Data with other group companies or third parties (such as service providers) if we follow required data privacy policies and procedures and use adequate security measures. The same applies to international data transfers.

2. Organization and Governance

- a. **Data Protection Officers:** Where required Nissan will appoint data protection officers or other required data protection officials (DPOs).
- b. **Committees/business stakeholders:** Nissan will set up appropriate committees which may include business stakeholders to ensure coordination of data privacy efforts.

3. Controls

Nissan and DPOs will monitor compliance with this policy and to assess data privacy risk and monitor deployment of data privacy programs as well as support employees on measures for compliance.

4. Training

Employees processing Personal Data will be regularly trained on compliance with this policy. Where necessary, advanced training should be provided that is adapted to the role or function.

Definitions

Personal Data: means any information that relates to an identified or identifiable individual. The information can include but is not limited to name, address, e-mail address, identification number, location data, vehicle identification number (VIN), online identifier (IP address), etc.