

LAST UPDATE: January 2019

Red Hill Mobility Group LLC and its affiliates (“Red Hill”, “we”, “our”, and “us”) respect your concerns about privacy and personal data protection and value our relationship with you. This Website Privacy Policy (the “Policy”) applies solely to personal information collected through the Red Hill website, online services, and web pages that post, specifically reference, and incorporate this Policy (all of the foregoing, collectively, the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal information we collect through the Site and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy.

1. COLLECTION AND USE OF PERSONAL INFORMATION

As you interact with Red Hill, there may be opportunities for you to provide us with your information. Additionally, we may collect certain information about you or your Red Hill products as further described below.

You may provide us with information about you or your Red Hill products through a number of sources: Red Hill websites, applications, product, and related events, surveys, social media platforms, and through our customer contact centers. We also receive information about you through Red Hill product sales records provided by your dealer and we may obtain, with your consent, data obtained from your Red Hill product.

The types of information that Red Hill collects about you may include, but are not limited to:

- Contact information (such as name, address, city, state and ZIP code, age or date of birth, occupation, social security number, email address and telephone number)
- Payment information (such as your bank account information, credit card number, debit card number, bank or investor account, CVV code, expiration date, and payment history)
- Information related to your creditworthiness, assets, income, or liabilities
- Information about your Red Hill product (such as license plate number, Red Hill product identification number (VIN), make, model, model year, selling dealer, servicing dealer, date of purchase or lease, lease/financing term, service history, mileage, oil/battery status, fuel or charging history, electrical system function, gear status, and diagnostic trouble codes)
- Information about your connected devices (such as mobile phone, computer, or tablet) and how you interact with our products, services, apps, and websites (such as IP address, browser type, unique device identifier, cookie data, and associated identifying and usage information)
- Demographic information (such as gender, date of birth, marital status, and household composition)
- Marketing profile information (such as when you plan to purchase a Red Hill product)
- Photographs and videos such as those that you may submit for social sharing

- Relationships you have with Red Hill in addition to the purchase and servicing of your Red Hill product (such as through a rewards card, etc.)
- Investor Information (name, address, phone number, and email address)
- The kind of Red Hill product you purchased
- The kind of service provided to you

The information Red Hill collects about you and your Red Hill products may be used:

- To provide products and services and maintain customer relationships
- To improve the quality, safety, and security of our products and services
- To administer your account(s) and process your payments for products and services
- To operate our websites and applications, including online registration processes
- To facilitate and support Red Hill dealer and supplier diversity programs and Red Hill grant programs
- To autofill data fields on our websites to improve your online experience
- To develop new products and services, including connected, autonomous, and car-sharing products and services
- To provide customer and Red Hill product support and service (such as recall information)
- For warranty administration and validation
- To provide information and product updates
- To evaluate Red Hill product performance and safety
- For research, evaluation of use, and troubleshooting purposes
- To verify eligibility for Red Hill product purchases or incentive programs
- For marketing and analytics purposes
- To support the electronic signature and delivery process between you and your dealer
- To customize and improve communication content
- To comply with legal, regulator, or contractual requirements

Communications with you in connection with these uses may be via mail, telephone, e-mail, text message, social media, or other electronic messages, or via our websites and applications.

Personal Information You Provide

The privacy and security of the personal information that Red Hill collects from you is a priority for Red Hill. When you visit this Site you may be asked or choose to provide personal information that could reasonably be used to contact you or to identify you personally including, but not limited to: your name, address, telephone number, birth date, and email address. If you choose to purchase any products or use services offered on the Site, Red Hill may ask you to provide your name, mailing address, telephone number and email address, as well as certain financial information (e.g., credit card number) for the purposes of credit checks, payment, and processing of any order.

- If you purchase products from the Site, we request that you provide your name, email address, billing and shipping address, credit card information, and any other information necessary to complete the transaction.
- You may choose to finance your purchase of products from Red Hill pursuant to one of several financing options made available by third-party financial institutions. If you choose to finance your purchase of any products, you will be directed to one of the third-party financial institutions with which Red Hill has a business relationship to make an application directly through that financial institution in connection with which the financial institution will ask you

for the personal and financial information applicable to their own application process, the privacy and security of which will be governed by their privacy policies.

- You may choose to receive certain communications from Red Hill via your email address upon interaction with the Site. From time to time Red Hill may include surveys, information requests, or other features on the Site which ask you to provide personal information such as your name, telephone number, email address or mailing address. Any information you may provide will be used by Red Hill to allow you to participate in the particular feature being offered. Red Hill may also retain any information you provide in order to send you information about Red Hill' products and services that may be of interest to you. Red Hill will provide you with the opportunity to opt out of receiving such communications. We may use one or more service providers to administer these messages, but we do not share your email address with spammers or any other third parties without your permission.

You will be informed what personal information is required and what information is optional when asked to submit personal information to us. By submitting personal information to Red Hill at this Site, you hereby consent to Red Hill's collection, use, and disclosure of such personal information.

We may combine the personal information you submit directly through this Site with other personal information we have collected from you, whether on- or offline. We may also combine it with information we receive about you from other sources, such as other companies, publicly available information sources (including information from your publicly available social media profiles), and other third parties.

Passive Information Collection and Use

As you navigate around this Site, certain information can be passively collected (that is, gathered without you actively providing the information), using various technologies. We passively collect and use information in a variety of ways, including:

- Through your browser: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. We may collect similar information, such as your device type and identifier if you access this Site through a mobile device.
- Cookies: Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on this Site, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate navigation, and display information more effectively. In addition, we use cookies to gather statistical information about Site usage in order to continually improve its design and functionality, understand how individuals use it, and to assist us in resolving questions regarding it.
- You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. If you set your browser to reject cookies, part of the Site may not work for you.

- Pixel tags, web beacons, clear GIFs, or other similar technologies: These may be used in connection with some Site pages to, among other things, track the actions of Site users and compile statistics about Site usage and response rates.
- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits this Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering this Site.
- Device Information: We may collect information about your Device, such as a unique device identifier.
- Do Not Track Requests: Your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information for analytics and internal purposes. The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or Device to delete and disable cookies and other tracking/recording tools. Please note, depending on your type of Device or browser, it may not be possible to delete or disable all tracking mechanisms on your Device.

We permit third-party advertising partners to use the foregoing tracking technologies to collect information about your browsing activities over time and across different websites when you use the Site. For example, we use advertising services provided by third-party ad partners, such as Google, to market our service to you on other websites and online services. Through a process called “retargeting,” each service places a cookie on your browser when you visit the Site so that they can identify you and serve you ads on other sites around the web based on your browsing activity. To avoid use of this information for advertising by these third-party ad partners, you can change your browser settings to reject cookies or to notify you when cookies are set and you could select the Do Not Track option on your browser, though we have no control over and cannot confirm whether these third-party ad partners honor the Do Not Track browser signal. Additionally, many advertising companies are members of the NAI or DAA and/or provide opt outs on those industry pages at networkadvertising.org/choices or aboutads.info/choices.

Integrated Accounts and Social Media Information

We may implement applications or “widgets” from third-party providers (e.g., Facebook, Twitter, Instagram, LinkedIn, etc.) that allow interaction, integration or content sharing with third-party services. These widgets or applications may be visible on a page you visit on our Site or may require log-in through the third-party provider’s service. The third party providing the widget or integration may offer controls for you to manage your interactions. Any interaction with a third-party widget or application typically allows the third party to collect some information about you (whether through cookies, registration information or otherwise). These third parties may even track you when you do not interact with the widget. If you have engaged any of these third-party service providers, their respective privacy policies will govern their tracking and collection of information. You should review these third-party policies to understand these practices.

How We Use and Disclose Information

We use and disclose personal information you provide to us as described to you at the point of collection, such as when you (1) register for a user account, (2) submit payment or credit card information, (3) submit your name and e-mail address to receive product updates and marketing

information, and (4) send e-mail messages or feedback, or transmit other information by e-mail. When you elect to engage in such activities, we may ask that you provide us personal information, such as your first and last name, mailing address (including zip code), e-mail address, mobile telephone numbers, and payment information.

We also use and transfer personal information from or about you:

- to respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;
- to send you information regarding our relationship with you or regarding this Site, changes to our terms, conditions, and policies and/or other administrative information; and
- for our business purposes, such as marketing new products and services, data analysis, audits, developing new products or services, enhancing our Site, improving our products and services, identifying Site usage trends, and determining the effectiveness of our Site.
- to our third-party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, credit card processing, IT services, e-mail services, marketing services, auditing services, and other services, in order to enable them to provide services;
- to verify your information, approve your registration as a user of the Site, authenticate payments and process orders, Red Hill may disclose certain financial and other information you provide to Red Hill to third parties offering products and services for sale on the Site, as well as to third parties that provide credit reporting, payment or order fulfillment services;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings); and
- when we otherwise have your consent. For example, if you sign up for programs offered by our partners, we may share certain information with the partner. This could include but is not limited to, enrollment information and the activation status of your device. Similarly, when you connect third-party devices and services to your Red Hill Products, you are shown information about any proposed exchange of data. Your consent is required to allow these exchanges on your behalf and you can change your mind at any time.

In addition, we use and disclose personal information collected through this Site as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to comply with any legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our agreements and terms of use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use and disclose personal information collected through this Site in other ways, with your prior consent.

We also use and disclose information we collect passively as described above, under "Passive Information Collection and Use," and for any other purpose, except where we are required to do otherwise under applicable law (for example, if we are required to treat such information as personal information). In addition, we may use and disclose information that is not in personally identifiable form (such as anonymized, masked or de-identified information) for any purpose. If we combine information that is not in personally identifiable form with information that is (such as combining your name with

your geographical location), we will treat the combined information as personal information as long as it is combined.

Use of Information for Marketing Purposes

Red Hill and our affiliates may send you regular promotional communications about our products, services, events, and promotions. Such promotional materials may use the “Red Hill” brand and may be sent to you via different channels, such as email, phone, SMS text messages, postal mailings, and third-party social networks.

In order to provide you with the best-personalized experience, sometimes these communications may be tailored to your preferences (for example, as you indicate these to us, as we may have inferred from your Site visits, or based on the links you click in our emails). When required by applicable law, we will obtain your consent before starting these activities. In addition, you may withdraw your consent (opt out) at any time.

In particular, you can opt out from receiving marketing-related emails by following the unsubscribe instructions provided in each email. If you can sign-in to your Red Hill account, you may be able to change your communication preferences under the relevant section of the Site. You can also contact us using the contact details provided below to opt out from receiving marketing-related communications.

Please note that even if you opt out from receiving marketing communications, you might still receive administrative communications from us, such as technical updates of our products, order confirmations, notifications about your account activities, and other important notices.

2. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL INFORMATION

Personal information will be collected, stored, processed and transmitted in accordance with Red Hill’s established policies and applicable federal, state, local and foreign laws, rules and regulations.

The principles of Red Hill with respect to the processing of personal information are as follows: (1) personal information will be processed fairly and lawfully, (2) personal information will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (3) personal information collected by Red Hill will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and processed, (4) personal information collected by Red Hill will be accurate and, where necessary, kept up to date to the best of our ability, (5) personal information collected by Red Hill will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal information was collected, and (6) personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

If Red Hill engages in the processing of personal information for purposes other than those specified in this Policy, Red Hill will provide notice of these changes, the purposes for which the personal information will be used, and the recipients of personal information.

3. THIRD-PARTY SITES AND SERVICES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or web property (including, without limitation, any application) that is available through this Site or to which this Site contains a link. The

availability of, or inclusion of a link to, any such site or property on this Site does not imply endorsement of it by us or by our affiliates.

Third parties may offer products and services on the Site and collect information about you by requesting certain information necessary to provide a particular product or service (including, for example, insurance coverage for your Red Hill products or reports of insurance claims). Red Hill may also obtain certain information about its users from third-party customer research groups (e.g., demographic information) which Red Hill uses to learn more about its customers. Red Hill does not control the policies and practices of third parties in relation to the use and disclosure of any information about users collected by third parties on the Site or in market research programs conducted by such third parties and any use or disclosure of such information by third parties is not governed by this Policy.

4. CHOICES AND ACCESS

We give you choices regarding our use and disclosure of your personal information. Red Hill provides you with the opportunity to receive information by email, regular mail or telephone calls from Red Hill, or third parties which may be of interest to you, including information relating to new products and services offered on the Site by Red Hill, or other third parties. If you do not want to receive any information by email, regular mail or telephone calls, you may opt out of further communications provided by Red Hill at any time by: (i) submitting a request [online](#); or (ii) writing to Red Hill at Red Hill Mobility Group LLC, 819 Red Hill Road, Cameron, NC 28326, Attention: Customer Service. Please note that Red Hill can only comply with requests relating to email, regular mail, or telephone communications provided by Red Hill. If you no longer wish to receive further information by email, regular mail, or telephone from any third party, you will need to contact such third party directly to opt out of further communications being provided to you. We will seek to comply with your request(s) as soon as reasonably practicable.

If applicable, and you would like to review, correct, update, or delete the personal information that you have provided via this Site, please contact us. We will try to comply with your request as soon as reasonably practicable.

5. ACCURACY

It is your responsibility to provide Red Hill with accurate personal information. Except as otherwise set forth in this Policy, Red Hill shall only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, Red Hill shall take reasonable steps to ensure that personal information is accurate, complete, current and relevant to its intended use.

6. YOUR RIGHTS OVER YOUR INFORMATION

You can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. You can also ask for it to be erased and you can ask us to give you a copy of the information. You can also ask us to stop using your information and limit how we use your information.

Your California Privacy Rights

Under California's "Shine the Light Law," California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the

categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year.

To obtain this information on behalf of Red Hill, please send an email message to ryan@redhillmg.com with "Request for California Privacy Information" on the subject line and in the body of your message. We will provide the requested information to you at your email address in the response. Please be aware that not all information is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response. For an explanation of our privacy practices, please review this Privacy Policy, which is available by clicking the "Privacy Policy" link on our home page.

7. RETENTION PERIOD

We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

8. SECURITY

Red Hill has implemented security measures designed to protect personal information provided by you against unauthorized access and use. Red Hill also uses commercially reasonable efforts to establish secure connections with your web browser for any transactions conducted online using a credit card or other financial information you may provide to Red Hill. Please be aware, however, that no-data transmission over the Internet is 100% secure and any information disclosed online can potentially be collected and used by parties other than the intended recipient. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the CONTACTING US section below.

9. USE OF SITE BY MINORS

We do not intentionally collect information from individuals under the age of 13. The Site is not directed to individuals under the age of 13, and we request that these individuals not provide personal information through this Site.

10. COMPLIANCE WITH LOCAL LAWS

This Policy is meant to guide Red Hill with respect to personal information collected from or about you at this Site. While this Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to Red Hill ("Local Laws") may require standards which are stricter than this Policy and, in such event, Red Hill will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions. All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), you specifically acknowledge and consent to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules, and a lower standard of required protection, than in your country. Irrespective of which country your personal data is transferred, we would only share your personal data under a 'need to know' basis. In these circumstances, we will, as required by applicable law, ensure that your privacy rights are adequately protected by organizational, technical, contractual, and/or other lawful means.

11. UPDATES TO THIS PRIVACY POLICY

We may change this Policy. Please review the LAST UPDATE legend at the top of this page to see when this Policy was last revised. Any changes to this Policy will become effective when we post the revised Policy on this Site. Your use of this Site following these changes means that you accept the revised Policy.

12. COMPLIANCE

Red Hill will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented, and accessible. If you believe that your personal information has been processed or disclosed in violation of this Policy, Red Hill encourages you to raise any concerns using the contact information provided in this Policy. Red Hill will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.

13. CONTACTING US

If you have any questions about this Policy, please contact us using the contact information below.

For a resident of the EU, EEA, or Switzerland, our contact information is:

By mail: Red Hill Mobility Group LLC, 819 Red Hill Road, Cameron, NC 28326
Attention: EU Data Protection Officer
By email: ryan@redhillmg.com

For all others, our contact information is:

By mail: Red Hill Mobility Group LLC
819 Red Hill Road, Cameron, NC 28326
Attention: Legal Department
By email: ryan@redhillmg.com