

PRIVACY NOTICE

Last Updated: January 1, 2023

This Privacy Notice explains how we collect, use, disclose and otherwise process your personal data in connection with our Services.

Who We Are: Michelin North America, Inc. (MNAI), Michelin North America (Canada) Inc. (MNA(C)I), Michelin Retread Technologies, Inc. (Michelin Retread Technologies), Michelin Retread Technologies (Canada) Inc., Oliver Rubber Company, LLC and Oliver Rubber Canada Limited (collectively “Michelin”, “we”, “us”, or “our”) with operations throughout the United States and Canada.

Our Services: When we use the term “Services,” we are referring only to the products and services that we offer through our brands, including without limitation, Michelin, BFGoodrich, Uniroyal, Michelin Retread Technologies, Oliver, Maestro and Tweel, that post or link to this Privacy Notice (the “Brands”) such as products, websites, digital services, mobile applications, and services.

This Privacy Notice does not cover or address, for example:

- Any of Michelin’s other product or service offerings, including other websites and mobile applications that do not post or link to this Privacy Notice. To learn more about Michelin’s personal data practices relating to these other product or service offerings, please review their respective privacy notices and policies.
- Personal data and privacy practices relating to job applicants, employees, or other personnel.
- Privacy practices of independent third-party retailers that sell Michelin products.

Your use of the Services is subject to this Privacy Notice and the applicable Terms of Use:

- For U.S. website visitors: please see our Terms of Use available at: [Legal & Privacy Center \(US\) – Website Terms of Use](#).
- For Canadian website visitors: please see our Terms of Use available at: [Legal & Privacy Center \(Canada\) – Website Terms of Use](#).

If you do not agree with any term in this Privacy Notice, please do not use the Services or submit any personal data. Please read the following Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

Customer Data

Data protection laws sometimes differentiate between “controllers” and “processors” of personal data. A “controller” determines the purposes and means (or the why and the how) of processing personal data. A “processor,” which is sometimes referred to as a “service provider,” processes personal data on behalf of a controller subject to contractual restrictions.

As part of our business relationship with our customers, we are often asked to receive, gather, store, analyze, or otherwise process information, which may include personal data, on behalf of our customers. We refer to this type of information and personal data as “customer data.” When we process customer data,

we generally act as a processor. This means we process customer data on behalf of our customers subject to restrictions set forth in our contracts with them.

This Privacy Notice does not cover or address how we or our customers process customer data in connection with our role as our customers' processor. Instead, this Privacy Notice only covers our processing of personal data in our capacity as a controller. In addition, we are generally not permitted to respond to individual requests relating to customer data. As a result, we recommend referring to the privacy notice of the business or government organization with which you have a relationship for information on how they engage processors, like us, to process customer data on their behalf.

Region-Specific Disclosures

Depending on your country, province or state of residence certain rights may apply to you. Please refer below for disclosures that may be applicable to you:

- **Europe:** If you are located in the EU, Switzerland or the UK, please visit: https://www.michelin.com/en/privacy-policy/#_ga=2.184844897.95499248.1671201986-2041815807.1666706733 for EEA-specific privacy disclosures.
- **Canada:** If you are a resident of Canada, for Canada-specific privacy disclosures, please visit: [Legal & Privacy Center \(Canada\) – Canadian Privacy Disclosures](#).
 - *For U.S. website visitors:* please see the “Additional U.S. Privacy Disclosures” section below.
- **United States:** If you are a resident of the State of California, Colorado, Connecticut, Nevada, Utah, or Virginia in the United States, for additional U.S. State-specific privacy disclosures, please visit: [Legal & Privacy Center \(US\) – U.S. Privacy Disclosures](#).
 - *For Canadian website visitors:* please see the “Additional Canadian Privacy Disclosures” section below.

What is Personal Data?

When we use the term “personal data” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a person or household. It does not include aggregated or de-identified information that is maintained in a form that is not reasonably capable of being associated with or linked to a person.

1. Our Collection of Personal Data

We collect personal data about you in a variety of ways. Sometimes we collect personal data automatically when you interact with the Services, and sometimes we collect the personal data directly from you. At times, we may collect personal data about you from other sources and third parties, even before our first direct interaction. We may link or combine your activities and information collected from you on our websites with information we have collected from you offline (e.g., at an event), information we receive from third parties, as well as information we collect automatically through tracking technologies.

Personal Data You Provide

We may collect the following personal data from you in while providing our Services:

- **Contact Information**, including your name, email address, telephone number, address and zip/postal code, preferred language, customer profile when you purchase a product from a Brand e-commerce website or register for the Services, submit information through our warranty or rebate registration process, take advantage of or participate in an offer or promotional activity (e.g., sweepstakes or contest), sign up for our newsletters, request further information from us, respond to a survey or questionnaire, or otherwise communicate with us or interact with the Services.
- **Payment and Transaction Information**, including information collected on a Brand e-commerce website or saved in a Michelin account profile such as products purchased, the third-party dealer from whom you purchased a Michelin product, date and time of your transaction, amount purchased, order details, whether you used a particular coupon or promotion, and payment information when you make a purchase or transaction from the e-commerce website. Payments may be processed by third-party payment processors. Please refer to the applicable processor's terms and privacy policy for more information about how payment information is processed and stored.
- **Inquiry and Communication Information**, such as the content of your email, live chat conversation or contact form submission on our websites, and, where applicable, the content of calls with us when you contact us. We may also collect any other communications between you and Michelin and any other information and content you provide to Michelin.
- **Sensory Information**, including pictures you provide or upload in connection with the Services, and the content and audio recordings of phone calls between you and Michelin and you and our service providers, including our third-party call center operations vendors, that we record where permitted by law.
- **Demographic Information**, including age.
- **Account Information**, including your username and password.
- **Vehicle and Driver's License Information**, including driver's license information, VIN number, Department of Transportation (DOT) code, vehicle type, make, model and registration information, and tire depth and size information when you purchase certain products from us or register for the Services.
- **Professional/Employment Information**, including your job title, department, employer or business, type of industry and trade or professional association membership information.
- **Location Information**, including information about your physical location that you upload to the Services, such as when you use our dealer locator tool to identify nearby dealers of Michelin products or interact with our emergency roadside services.
- **Personal Life information**, such as life habits (hobbies) and family situation.

- **Economical and financial information**, revenue, socio-demographic information, socio-economic category.

Personal Data Automatically Collected

As is true of most digital platforms, we may collect certain personal data automatically when you visit our online services, including:

- **Log File Data**, including your internet protocol (IP) address, operating system, browser type, browser id, date/time of visit, and pages visited.
- **Analytics Data**, including the electronic path you take to the Services, through the Services and when exiting the Services, as well as your usage and activity on the Services, such as the links and object you view, click, or otherwise interact with (also known as “Clickstream Data”).
- **Location Data**, including your general geographic location based on your IP address or more precise location when accessing our online services through a mobile device. We may also use the Google Maps Application Programming Interface to gather information about your location. Google uses various technologies to determine your location, including your IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (to learn more, please see Google Maps’ privacy policy at: <https://policies.google.com/privacy>).
- **Information You May Post/Submit to our Services**. We may collect information about how you use and interact with our Services, including any information and content you post to the Services. If you share photos and video from a mobile device, we will access your device camera roll and camera with your permission as needed to post your content. If you need to update your permissions, you can do so in the “Settings” app of your device.

For information about our and our third-party partners’ use of cookies and related technologies to collect information automatically, and the choices you have in relation to its collection, please visit the Cookie Notice of the relevant Michelin brand website by clicking on “Your Privacy Choices” in the footer of the applicable website.

Personal Data Provided by Other Sources

We also may obtain your personal data from other sources which we often combine with personal data we collect either automatically or directly from you.

We may receive the same categories of personal data as described above from the following sources and third parties:

- **Our Brands**: We may receive information about you from our other Brands and affiliates, so that information you provide to one Brand or affiliate may be used by us to provide you Services, communicate with you or provide you advertisements or other personalized content.
- **Service Providers**: Our service providers that perform services on our behalf, such as our call center operations vendors, identity verification providers, payment processors on a Brand

e-commerce website, third party dealers that deliver products and services on our behalf and analytics providers. For example, we may receive personal data from our service providers that conduct call center support, marketing, or analytics activities.

- **Business / Promotional Partners:** Our business and promotional partners whom we partner with to provide our contests, sweepstakes or other joint promotional activities or co-branded services may collect personal data in connection with these activities and may share some or all of the information with us.
- **Social Networks:** When you interact with the Services through various social media networks, such as when you “Like” us on Facebook or when you follow us or share our content on Facebook, Pinterest, Twitter, Instagram, YouTube, LinkedIn, or other social networks, we may receive some information about you that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. You should always review and, if necessary, adjust your privacy settings on third party websites and social media networks and services before linking or connecting them to the Services.
- **Other Third Parties and Publicly Available Sources:** From time to time, we may receive information about you from third parties. For example, we may obtain information from our marketing partners or from third parties to enhance or supplement our existing user information. Where permitted by applicable law, we may also collect information about you that is publicly available, including contact information, employment-related information, and product interest information. We may combine this information with the information we collect from you directly.

Business Representatives Data Collection Practices

We also may collect professional personal data about representatives of third-party businesses, including representatives of our business and enterprise customers and business partners, in connection with our Services and the operation of our business, which may include:

- **Contact Information:** Including full name, email address, mailing address and telephone number.
- **Professional Information:** Including job title, job function, company name and characteristics, professional background, and nature of the relationship with us.
- **Tax and Payment Information:** Including a personal tax identification number, bank account information, and payment information where the individual is a representative of a sole proprietor or similar legal structure that uses personal tax and account information in lieu of separate business information.
- **Contract Information:** Including any information relating to our contractual relationship.
- **Inquiry Information:** Including the contents of emails, texts, and other communications and, where permitted by law, recordings of calls with us.
- **Feedback Information:** Including information provided in response to surveys we may conduct with customers or business partners, or unsolicited feedback received regarding our services and business.

If you engage in our services or interact with us through your employer, company, or organization, we may receive the above information from the company.

2. Our Use of Personal Data

We may collect, use, and disclose your personal data for purposes identified at the time of collection, or as otherwise permitted or required by law, including the following purposes:

- To fulfill or meet the reason the information was provided, such as to process your requests or payment on a Brand e-commerce website in connection with your transactions, to respond to inquiries, to process your warranty or rebate claims and registration for the Services, including verifying your information to ensure its accuracy and validity.
- To personalize your experience (e.g., to locate a nearby dealer of Michelin products) and customize content on the Services relevant to your interests, including but not limited to targeted offers and ads through our websites, email, social media channels, third-party sites, or on other devices you may use.
- To communicate with you, including via email, text message, push notification and/or telephone calls.
- To operate, maintain, and provide the features and functionality of the Services.
- To complete the performance of the Services pursuant to an agreement between you and us.
- To send you important information regarding the Services, such as certain changes to our terms, conditions, policies, and/or other administrative information. Because this information may be material to your use of the Services, you may not opt out of receiving such communications.
- To send you certain product recall notifications or information.
- To inform you of products, programs, services, and promotions that we believe may be of interest to you, including, without limitation, adding you to our email/ mailing lists and permitting you to participate in sweepstakes, contests, rebates and similar promotions (collectively, "Promotions") or following up with you if you are the winner of a Promotion.
- To evaluate your eligibility for certain types of Promotions, offers, products or services that may be of interest to you.
- To help maintain the safety, security, and integrity of the Services, technology assets, and business.
- For our internal business purposes, such as data analysis, customer research, audits, fraud prevention, developing new products and/or features, evaluating, enhancing the Services, improving the Services, and identifying usage trends, and determining the effectiveness of our promotional campaigns, including to inform our machine learning for purposes such as user engagement.

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations and enforce our corporate reporting obligations and the applicable Terms of Use, or to comply with applicable laws.
- For purposes disclosed at the time you provide your personal data or as otherwise set forth in this Privacy Notice.

We will only keep your personal data for as long as necessary to fulfill the purpose for which it was collected or as otherwise required or permitted by applicable law.

We may also use aggregate personal data in a manner such that the end-product does not uniquely identify you or any other user of the Services, for example to compile statistics about the Services based on responses to our product surveys or questionnaires.

We may provide additional privacy disclosures where the scope of the inquiry/request and/or personal data we require fall outside the scope of this Privacy Notice. In that case, the additional privacy disclosures will govern how we collect, use, and disclose the information you provide at that time.

Segmentation and Targeting

As part of our services, Michelin may need to create user groups in order to better target the offers and communications sent.

The segments or profiles are produced on the basis of information held by Michelin or the companies of the Michelin group (account data, navigation data, purchase data, declarative data) or information collected in the context of our relations with partners (e.g., social networks, etc.).

Michelin undertakes not to use, for segmentation and targeting purposes, personal data likely to reveal racial or ethnic origin, political opinions, religious or philosophical convictions or trade union membership, as well as genetic, biometric, health data or data relating to the sexual life or sexual orientation of a natural person, in accordance with applicable laws.

3. Our Disclosure of Personal Data

We may disclose your personal data for purposes and uses that are consistent with this Privacy Notice in the following ways:

- **Within Michelin:** We may disclose personal data between and among Michelin and its current and future parents, affiliates, subsidiaries, our Brands, and other companies under common control or ownership.
- **International Transfers of Personal Data:** Michelin is an international group with activities around the world. We may transfer your personal data as described in this Privacy Notice to a country other than the country where we originally collected it. Those countries may not have the same personal data protection laws as your country. However, when we transfer your information to other countries, we will protect that information as described in this Privacy Notice and take steps, where necessary, to ensure appropriate safeguards are in place.

- **Business / Promotional Partners:** We may share limited information with third parties with whom we partner to provide contests and sweepstakes, or other joint promotional activities or co-branded services.
- **Online Advertising Partners:** We may also share personal data with advertising networks or permit these partners to collect information from you directly on our websites to facilitate online advertising, such as search engines and social network advertising providers to serve targeted ads to you or to groups of other users who share similar traits, such as likely commercial interests and demographics, on third-party platforms. For more information, including how to opt out of interest-based advertising, please read the applicable website Cookie Notice accessible via the “Your Privacy Choices” in the footer of the applicable website.
- **Service Providers:** We may disclose personal data with third-party vendors, third-party dealers, consultants, and other service providers whom we engage to perform functions or services on our behalf and under our instructions in connection with the purposes and uses described in this Privacy Notice.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership, in compliance with applicable law.
- **Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect the rights and property of Michelin, our agents, customers, and others, including to enforce our agreements, policies, and the applicable Terms of Use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or
 - as otherwise required by applicable law.
- **With Your Consent or At Your Direction:** We may disclose personal data about you to certain other third parties with your consent or at your direction.

4. Children’s Personal Data

Our websites and online Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 14. If you are under the age of 14, please do not use our websites or online Services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 14 has provided personal data to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal

data we have collected has been provided by a child under the age of 14, we will promptly delete that personal data.

5. Third-Party Websites

Our websites and online Services may include links to third-party websites, plug-ins, and applications. Except where we post, link to, or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to, and we are not responsible for, any personal data practices of third-party websites and online services or the practices of other third parties. To learn about the personal data practices of third parties, please visit their respective privacy notices.

6. Choices and Control Over Your Information

Modifying and deleting your information: As applicable, if you have an account with us, you may update your account information and adjust your account settings by logging into your account. Please note that changes to your settings may require some time to take effect.

Access to device information: You may control the Services' access to your device information through your "Settings" app on your device. For instance, you can withdraw permission for the Services to access your network devices and geolocation.

How to control your email preferences: You can stop receiving promotional email communications from us at any time by clicking on the "unsubscribe link" provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the service, technical and security notices).

SMS text messages and telephone calls: We may use personal data we collect to communicate with individuals via text message and telephone calls, including (with your consent) to market to you or offer you information and updates on products or services we think you may be interested in. You can unsubscribe from marketing calls or text messages at any time by replying STOP or clicking the unsubscribe link (where available) in one of our messages. For more information, please see our Terms of Use (available at the top of this Privacy Notice).

Online advertising and tracking: Please refer to the applicable website Cookie Notice to learn more about how we work with third party partners to collect data through tracking technologies for various purposes, including analytics, advertising, and to understand your choices.

7. Updates to This Privacy Notice

We may make updates to our Privacy Notice from time to time. Any changes we make to this Privacy Notice in the future will be posted on this page. All changes shall be effective from the date of publication unless otherwise provided.

8. Accountability and Contact

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to Privacy.AMN@michelin.com

Alternatively, inquiries may be addressed to:

North America Privacy Officer
Michelin North America, Inc.
One Parkway South
Greenville, SC 29615

ADDITIONAL CANADIAN PRIVACY DISCLOSURES

Last Updated: January 1, 2023

1. Scope of Rights

These additional Canadian Privacy Disclosures (the “Canadian Disclosures”) supplement the information contained in our Privacy Notice regarding the Michelin Brand websites, products and service offerings, mobile applications and services that post or link to these Privacy Disclosures (collectively, “Michelin”, “we”, “us”, or “our”) and apply solely to individual residents of Canada (“consumers” or “you”).

Unless otherwise expressly stated, all terms in these Canadian Disclosures have the same meaning as defined in our Privacy Notice or as otherwise defined in PIPEDA.

2. Personal Data Disclosures

We collect various categories and types of personal data from a variety of sources and for a variety of purposes. We also disclose personal data to a number of recipients. Please review the “Our Collection of Personal Data,” “Our Use of Personal Data” and, “Our Disclosure of Personal Data” sections of our Privacy Notice to learn more. We also disclose personal data for the purpose of displaying advertisements that are selected based on personal data obtained or inferred over time from an individual’s activities across businesses or distinctly branded websites, applications, or other services (otherwise known as “targeted advertising” or “cross-context behavioral advertising”).

We may at times receive, or process personal data to create, deidentified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain deidentified information, we will maintain and use the information in deidentified form and not attempt to reidentify the information except as required or permitted by law.

3. Your Privacy Rights

Depending on your province of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

The Right to Know	The right to confirm whether we are processing personal data about you and to obtain certain personalized details about the personal data we have collected about you, including: <ul style="list-style-type: none">• The categories of personal data collected;• The categories of sources of the personal data;• The purposes for which the personal data were collected;• The categories of personal data disclosed to third parties (if any), and the categories of
--------------------------	--

	<p>recipients to whom this personal data were disclosed;</p> <ul style="list-style-type: none"> • The categories of personal data shared for targeted advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for these purposes.
The Right to Access & Portability	The right to obtain access to the personal data we have collected about you.
The Right to Correction	The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.
The Right to Request Deletion	The right to request the deletion of personal data that we maintain about you, subject to certain exceptions.
The Right to Opt Out of Targeted Advertising	The right to direct us not to disclose personal data for certain targeted or cross-context behavioral advertising purposes.

4. How to Exercise Your Privacy Rights

Please note that when you submit a request to us to exercise your rights as outlined in the instructions below, your request will be Brand-specific.

To Exercise Your Privacy Rights

Please submit a request by:

- Filling out our online form available at: [WEBFORM](#); or
- Calling 1-888-971-3804.

We will need to verify your identity and confirm you are a resident of a Canada. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. As a result, we require requests to include name, email address, and province of residency. Although we try to limit the personal data collected in connection with a request to exercise any of the above rights, certain requests may require us to obtain additional personal data from you. In certain circumstances, we may decline a request, particularly where we are unable to verify your identity or locate your information in our systems, or where you are not a resident of one of the eligible jurisdictions.

To Exercise the Right to Opt Out of Targeted Advertising

Unless you have exercised your Right to Opt Out, we may disclose your personal data to third parties for targeted or cross-context behavioral advertising purposes. These third parties may use such information for their own purposes in accordance with their own privacy statements, which may include reselling or disclosing this information to additional third parties.

You do not need to create an account with us to exercise your Right to Opt Out. However, we may ask you to provide additional personal data so that we can properly identify you in our dataset and to track compliance with your opt out request. We will only use personal data provided in an opt out request to review and comply with the request. If you chose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems.

To exercise your right to opt-out as it relates to the use of cookies and other tracking technologies for analytics and targeted ads, under applicable law, click on the “Your Privacy Choices” link in the footer of the website for which you wish to opt-out of targeted advertising.

Once you make an opt-out request, you may change your mind and opt at any time by returning to the “Your Privacy Choices” link or contacting us at Privacy.AMN@michelin.com.

Authorized Agent

In certain circumstances, you may be permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your province of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

5. Data Retention

We retain personal data only for as long as is reasonably necessary to fulfill the purpose for which it was collected. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax and accounting requirements set by a legislature, regulator, or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations. Therefore, we retain personal data for as long as the individual continues to use our services for the purposes explained in the Our Use of Personal Data section in our Privacy Notice. When an individual discontinues the use of our services, we will retain their personal data for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices they have made, such as to receive marketing communications. In particular, we will retain call recordings, the personal data supplied when joining our services, including complaints, claims (for insurance products) and any other personal data supplied during the duration of an individual's contract with us for the services until the statutory limitation periods have expired, when this is necessary for the establishment, exercise, or defense of legal claims.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

6. Data Security

We use physical, technical, and administrative security measures designed to mitigate the potential for the unauthorized access, use, communication/disclosure, or alteration of your personal data. However, no system of security measures can guarantee the security of the personal data we collect. In addition, you have a shared responsibility to keep your personal data secure when you use our websites, mobile apps, and web applications. Please take the following steps to help secure your personal data: (i) install the latest security updates and anti-virus software on your device to help prevent malware and viruses; (ii) use the latest version of browsers (iii) if you have an online account with us, change your account password frequently; (iv) use complex passwords to lock your device and mobile applications; (v) do not use the same password for online accounts with us that you use elsewhere; and (vi) do not share your password with others.

7. Updates to These Canadian Privacy Disclosures

We may change these Canadian Disclosures from time to time. Any changes we make to this notice in the future will be posted on this page. All changes shall be effective from the date of publication unless otherwise provided.

8. Contact Us

If you have any questions or requests in connection with this Notice or other privacy-related matters, please send an email to Privacy.AMN@michelin.com.

Alternatively, inquiries may be addressed to:

North American Privacy Officer
Michelin North America, Inc.
One Parkway South
Greenville, SC 29615

ADDITIONAL U.S. PRIVACY DISCLOSURES

Last Updated: January 1, 2023

1. Scope of Disclosures

These Additional U.S. Privacy Disclosures (the “**U.S. Privacy Disclosures**”) supplement the information contained in our Privacy Notice regarding the Michelin Brand websites, products and service offerings, mobile applications and services that post or link to these U.S. Privacy Disclosures (collectively, “**Michelin**”, “**we**”, “**us**”, or “**our**”) and apply solely to individual residents of the States of California, Colorado, Connecticut, Nevada, Utah, and Virginia (“data subjects” or “you”).

These U.S. Privacy Disclosures provide additional information about how we collect, use, disclose and otherwise process personal data of individual residents of the States of California, Colorado, Connecticut, Nevada, Utah, and Virginia, either online or offline.

Unless otherwise expressly stated, all terms in these U.S. Privacy Disclosures have the same meaning as defined in our Privacy Notice.

2. Personal Data Disclosures

Personal Data

We collect various categories and types of personal data from a variety of sources and for a variety of purposes. We also disclose personal data to a number of recipients. Please review the “Our Collection of Personal Data,” “Our Use of Personal Data,” and “Our Disclosure of Personal Data” sections of our Privacy Notice to learn more. While we do not “sell” personal data in the traditional sense, we do, however, sell or share personal data for the purpose of displaying advertisements that are selected based on personal data obtained or inferred over time from an individual’s activities across businesses or distinctly branded websites, applications, or other services (otherwise known as “targeted advertising” or “cross-context behavioral advertising”).

Sensitive Information

The following personal data elements we collect may be classified as “sensitive” under certain privacy laws (“sensitive information”):

- Account name and password;
- Driver’s license number;
- Credit/debit card number plus expiration data and security code (CVV);
- Precise geolocation data.

As described in our Privacy Notice, we use account name and password, as well as payment card information and driver’s license number to provide certain of our products and services. We also use precise geolocation data to provide our Services with geolocation capabilities.

We do not sell sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising.

Deidentified Information

We may at times receive, or process personal data to create, deidentified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain deidentified information, we will maintain and use the information in deidentified form and not attempt to reidentify the information except as required or permitted by law.

3. Your Privacy Rights

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

<p>The Right to Know</p>	<p>The right to confirm whether we are processing personal data about you and, under California law only, to obtain certain personalized details about the personal data we have collected about you, including:</p> <ul style="list-style-type: none"> • The categories of personal data collected; • The categories of sources of the personal data; • The purposes for which the personal data were collected; • The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom this personal data were disclosed; • The categories of personal data sold (if any), and the categories of third parties to whom the personal data were sold; and • The categories of personal data shared for targeted advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for these purposes.
<p>The Right to Access & Portability</p>	<p>The right to obtain access to the personal data we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.</p>

The Right to Correction	The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.
The Right to Request Deletion	The right to request the deletion of personal data that we maintain about you, subject to certain exceptions.
The Right to Opt Out of Sales or Sharing for Targeted Advertising Purposes	The right to direct us not to sell or share personal data for certain targeted or cross-context behavioral advertising purposes.
The Right to Non-Discrimination	<p>The right not to receive retaliatory or discriminatory treatment for exercising any of the rights described above.</p> <p>However, please note that if the exercise of the rights described above limits our ability to process personal data (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.</p> <p>In addition, the exercise of the rights described above may result in a different price, rate, or quality level of product or service where that difference is reasonably related to the impact the right has on our relationship or is otherwise permitted by law.</p>

4. How to Exercise Your Privacy Rights

Please note that when you submit a request to us to exercise your rights as outlined in the instructions below, your request will be Brand-specific.

To Exercise Your Privacy Rights

Please submit a request by:

- Filling out our online form available at: [WEBFORM](#); or
- Calling 1-888-971-3804.

We will need to verify your identity and confirm you are a resident of a state that offers the request right(s) before processing your request. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. As a result, we require requests to include name, email address, and state of residency. Although we try to limit the personal data collected in connection with a request to exercise any of the above rights, certain requests may require us to obtain additional personal data from you. In certain circumstances, we may decline a request, particularly where we are unable to verify your identity or locate your information in our systems, or where you are not a resident of one of the eligible states.

To Exercise the Right to Opt Out of the Selling or Sharing of Personal Data for Targeted Advertising Purposes

Unless you have exercised your Right to Opt Out, we may “sell” or “share” your personal data to third parties for targeted or cross-context behavioral advertising purposes. The third parties to whom we sell or share personal data may use such information for their own purposes in accordance with their own privacy statements, which may include reselling or sharing this information to additional third parties.

You do not need to create an account with us to exercise your Right to Opt Out. However, we may ask you to provide additional personal data so that we can properly identify you in our dataset and to track compliance with your opt out request. We will only use personal data provided in an opt out request to review and comply with the request. If you chose not to provide this information, we may only be able to process your request to the extent we are able to identify you in our data systems.

To exercise your right to opt-out as it relates to the use of cookies and other tracking technologies for analytics and targeted ads, click on the “Your Privacy Choices” link in the footer of the website for which you wish to opt-out of targeted advertising.

Once you make an opt-out request, you may change your mind and opt at any time by returning to the “Your Privacy Choices” link or contacting us at Privacy.AMN@michelin.com.

Authorized Agent

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent’s authority to act on your behalf. In order to verify the authorized agent’s authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Appealing Privacy Rights Decisions

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request. All appeal requests should be submitted by emailing us at Privacy.AMN@michelin.com with the subject line, “Privacy Request Appeal.”

Minors Under Age 16

We do not sell the personal data of consumers we know to be less than 16 years of age. Please contact us at Privacy.AMN@michelin.com to inform us if you, or your minor child, are under the age of 16.

5. California-Specific Privacy Disclosures

The following disclosures only apply to residents of the State of California:

Personal Data Collection

In the last 12 months, we may have collected the following categories of personal data:

- **Identifiers**, such as name, email address, telephone number, address, zip code, account username and password, or other similar identifiers.
- **California Customer Records** (Cal. Civ. Code § 1798.80(e)), such as driver's license information, credit/debit card information, bank account information or other payment information if you engage with one of our Brand ecommerce sites.
- **Protected Classification Characteristics**, such as age.
- **Commercial Information**, such information about products or services purchased or considered, whether you used a particular coupon code or promotion, information about the third-party dealer from whom you purchased a Michelin product, and information about your use of the Services.
- **Internet/Network Information**, such as your browsing history, log and analytics data, search history and information regarding your interaction with our website.
- **Geolocation Data**, such as information about your physical location collected from geolocation features on your device, including your IP address and GPS (e.g., latitude and/or longitude), and location information you provide to the Services through our dealer locator tool.
- **Sensory Information**, such as pictures you provide or upload in connection with the Services, and the content and audio recordings of phone calls between you and Michelin and/or you and our service providers, that we record where permitted by law.
- **Professional/Employment Information**, such as job title, department, employer or business, and trade or professional association membership information.
- **Other Personal Data**, such as information and content you post to the Services and other information you submit to us, including inquiry and communication information when you contact us. We may also collect certain information about your vehicle, such as VIN number, Department of Transportation (DOT) code, vehicle type, make, model and registration information, and tire depth and size information.
- **Inferences**, including information generated from your use of the Services reflecting predictions about your interests and preferences.

For more information about our collection of personal data, the sources of personal data, and how we use this information, please see the "Our Collection of Personal Data" and "Our Use of Personal Data" sections of our Privacy Notice.

Disclosure of Personal Data

As described in the "Our Disclosure of Personal Data" section of our Privacy Notice, we disclose personal data with a variety of third parties for business purposes or we may sell or share your personal data to third parties for targeted advertising purposes, subject to your right to opt out of selling or sharing (see the "Your Privacy Rights" section above).

In the previous 12 months, we have sold or shared for targeted advertising purposes all of the categories of personal data we collect, explained above, to third parties.

Data Retention

We retain personal data only for as long as is reasonably necessary to fulfill the purpose for which it was collected. However, if necessary, we may retain personal data for longer periods of time, until set retention periods and deadlines expire, for instance where we are required to do so in accordance with legal, tax and accounting requirements set by a legislature, regulator, or other government authority.

To determine the appropriate duration of the retention of personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations.

Therefore, we retain personal data for as long as the individual continues to use our services for the purposes explained in the “Our Use of Personal Data” section in our Privacy Notice. When an individual discontinues the use of our services, we will retain their personal data for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices they have made, such as to receive marketing communications. In particular, we will retain call recordings, the personal data supplied when joining our services, including complaints, claims (for insurance products) and any other personal data supplied during the duration of an individual’s contract with us for the services until the statutory limitation periods have expired, when this is necessary for the establishment, exercise, or defense of legal claims.

Once retention of the personal data is no longer necessary for the purposes outlined above, we will either delete or deidentify the personal data or, if this is not possible (for example, because personal data has been stored in backup archives), then we will securely store the personal data and isolate it from further processing until deletion or deidentification is possible.

Notice of Financial Incentives

We offer various programs, promotions and other financial incentives that may result in differences in our prices or services offered to consumers. For example:

- Discounts, coupons or other access to exclusive content, research, and insights for customers who sign up to receive our marketing emails or text messages;
- Discounts, coupons, or other benefits in connection with a contest or sweepstakes or similar promotion;
- Rewards or coupons when you refer a friend to use our service;
- Loyalty programs, where you earn rewards based upon your past purchases with us; or
- Discounts, coupons, cash back, and other special offers for shopping with our partners.

To obtain access to certain of these programs and other offerings, we may collect and retain personal information, such as name, contact information, professional information, account information, and shopping transaction information. We may sell or share personal information with our business and marketing partners who may use this information to send you promotional communications and targeted advertising.

We have determined that the value of these programs and other incentives are reasonably related to the value of the personal data we receive and otherwise process in connection with these programs and offerings, based on our reasonable but sole determination. We estimate the value of the personal data we receive and otherwise process in connection with these programs and offerings by considering the expense we incur in collecting and processing the personal data, as well as the expenses related to facilitating the program or offering.

The material aspects of any financial incentive will be explained and described in its program terms or in the details of the incentive offer. Participating in any financial incentive program is entirely optional and participants may withdraw from the program at any time. To opt-out of the program and forgo any ongoing incentives, please follow the instructions in the program's terms and conditions or contact us using the contact information below. Participating individuals may also opt out of receiving marketing communications by following the instructions set forth in the "Choices and Control Over Your Information" section of our Privacy Notice.

6. Updates to These U.S. Privacy Disclosures

We will update these U.S. Privacy Disclosures from time to time. When we make changes to these U.S. Privacy Disclosures, we will change the "Last Updated" date at the beginning of these U.S. Privacy Disclosures. If we make material changes to these U.S. Privacy Disclosures, we will notify you by updating the "Last Updated" date above or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

7. Contact Us

If you have any questions or requests in connection with these U.S. Privacy Disclosures or other privacy-related matters, please send an email to Privacy.AMN@michelin.com.

Alternatively, inquiries may be addressed to:

North American Privacy Officer
Michelin North America, Inc.
One Parkway South
Greenville, SC 29615