

# PRIVACY POLICY

## 1. What Information Do We Gather and Why?

The IATF and IAOB require Personal Information only when necessary. This Website only collects general Personal Information and does not process Sensitive Personal Information or other Important Information, as defined under various international laws. The table below identifies the nature of the Personal Information collected, the purposes for which it is collected, and the legal basis for each purpose.

Types of Information	Nature of Personal Information	Purpose for Processing	Legal Basis for Processing	Categories of Third Parties (with whom we may share or disclose this information)
Online Identifiers	Cookies	Cookies may be used for analytics purposes to assess website performance.	Except to the extent these cookies are necessary for the functioning of the website, we will only process your Personal Information in connection with these cookies with your Consent.	Host and Analytics Processors
Personal Information	Email Address	We collect your email address at your request to send you email correspondence relating to IATF updates.	Except to the extent these cookies are necessary for the functioning of the website, we will only process your Personal Information in connection with these cookies with your Consent.	Email Marketing Processor
Protected classification information	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Commercial Information	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Geolocation	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Professional or employment related information	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Education information	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Inferences drawn from other personal information	Not Applicable	Not Applicable	Not Applicable	Not Applicable

## 2. How Do We Obtain Your Personal Information?

We only receive your Personal Information if you provide it to us voluntarily when signing up for the IATF email updates.

## 3. Who Do We Share Your Personal Information With?

### IATF Personnel and Organizations

Your Personal Information is shared internally with our IAOB website development team and our marketing team.

### Third Party Service Providers

We may share your information with various third parties, including our website host and our email provider. If we engage other third parties to assist us with our processing, we will notify you and allow you to exercise your rights regarding this change in processing. We or our Service Providers also may use your information for the following Business Purposes (as defined in the CCPA) on a day-to-day basis:

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.

### **Regulators, Judicial Authorities, and Law Enforcement Agencies**

We may share your information with courts, law enforcement authorities, regulators, government officials or other parties where it is reasonably necessary for the establishment, exercise, or defense of a legal or equitable claim.

#### ***4. Do We “Sell” Your Personal Information?***

We do not “sell” your personal information (as currently defined under the California Consumer Privacy Act (“CCPA”)), meaning that we do not rent, disclose, release, transfer, make available or otherwise communicate your personal information to a third party for monetary or other valuable consideration. We will not sell your information unless we modify this Privacy Policy and take the additional steps required under the CCPA.

#### ***5. How Do We Protect the Personal Information We Collect?***

We use physical and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect, maintain, and otherwise handle.

### ***Security of Personal Data***

We are committed to protecting the security of your personal data. Depending on the circumstances, we may hold your information in hard copy and/or electronic form. For each medium, we use technologies and procedures to protect personal data. We review our strategies and update as necessary to meet our business needs, changes in technology, and regulatory requirements. We take our security obligations seriously and so should you. While we are responsible for maintaining the security of this Site, you must also access and use this Site in a manner that is responsible and secure. We adhere to internationally recognized security standards. In addition, we have implemented a series of policies, procedures, and training to address data protection, confidentiality, and security, and we update and review the appropriateness of these measures on a regular basis.

### ***Storage and Transfer of Personal Data***

The personal data we collect may be stored and processed in your region, in the United States or in any other country where we, our affiliates, or contractors maintain facilities, including outside the European Union. We take steps to ensure that the data we collect under this Privacy Policy is processed pursuant to the terms thereof and the requirements of applicable law wherever the data is located.

We also collaborate with third parties such as cloud hosting services and suppliers located around the world to serve the needs of our business, workforce, and customers. In some cases, we may need to disclose or transfer your personal data

within the IATF or to third parties in areas outside of your home country. When we do so, we take steps to ensure that personal data is processed, secured, and transferred according to applicable law.

If you would like to know more about our data transfer practices, please contact via email at: [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

### ***Retention of Personal Data***

We retain personal data for as long as necessary to provide the services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are required by law to keep some types of information for certain periods of time (e.g., statute of limitations). If your personal data is no longer necessary for the legal or business purposes for which it is processed, we will generally destroy or anonymize that information.

### ***6. How Long do We Keep Your Personal Information?***

The IATF and IAOB only retain the Personal Information collected from the Website as long as necessary and in accordance with the applicable laws.

### ***7. Existence of Automated Individual Decision-Making***

We currently do not use any automated decision-making regarding data collected on this Website. However, you will not be subject to a decision having a major influence on your rights and interests based solely on automated processing, including profiling, unless you explicitly consent.

### ***8. What Happens When We Update Our Privacy Notice?***

We may on occasion update our Privacy Policy. Your acceptance of any minor changes to this Privacy Policy is indicated by your continued use of our Services. If we make any material changes to our Privacy Policy, we will post a notice about the change at a prominent location on our Site. We encourage you to periodically review our Site and this Privacy Policy for any changes.

### ***9. What Are Your Rights Regarding Your Personal Data?***

We respect your right to access and control your personal data. You have choices about the data we collect. When you are asked to provide personal data that is not necessary for the purposes of providing you with our Products and Services, you may decline. However, if you choose not to provide data that is necessary to provide a Service, you may not have access to certain features, Sites, Products, or Services.

***Access to personal data:*** In some jurisdictions, you have the right to request access to your personal data. In these cases, we will comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under local law).

***Correction and deletion:*** In some jurisdictions, you have the right to correct or amend your personal data if it is inaccurate or requires updating. You may also have the right to request deletion of your personal data. Please note that such a request could be refused because your personal data is required to provide you with the products or services you requested, e.g. to deliver a product or send an invoice to your email address, or that it is required by the applicable law.

***Portability:*** If you reside within the European Union, you have the right to ask for a copy of your personal data and/or ask for it to be ported to another provider of your choice. Please note that such a request could be limited to the only personal

data you provided us with or that we hold at that given time and subject to any relevant legal requirements and exemptions, including identity verification procedures.

**Marketing preferences:** If you have provided us with your contact information, we may, subject to any applicable Spam Act or similar regulation, contact you via email, postal mail or telephone about our products, services and events that may be of interest to you, including newsletters.

E-mail communications you receive from us will generally provide an unsubscribe link allowing you to opt-out of receiving future email or to change your contact information.

If you are in the EU/UK, you have certain additional privacy rights that are listed below.

### *10. How Do You Opt-out of Personal Information Sharing with Our Business Partners?*

We may use third party analytics vendors to evaluate and provide us with information about the use of our Services and viewing of our content. Some of the information you see on our Sites may be customized based on automated predictions about your interests, which predictions are generated from your visits over time and across different websites, using tools such as Google Analytics. This information allows us to create content of greater interest to you and can also be used to serve ads based on your past visits to our Sites. Note that you can opt out of a third-party vendor's use of cookies, including use by Google, by visiting the Network Advertising Initiative opt-out page: <http://www.networkadvertising.org/choices/>.

For more information about how targeted Network Advertising works, please visit: <http://www.youradchoices.com/> or <http://www.networkadvertising.org/understanding-online-advertising>.

You may opt-out of third party targeted advertising or analytics in two ways: 1) By directly notifying a Network Advertising service provider via its opt-out tools (Please see above), or 2) using your browser's Do Not Track (DNT) settings to indicate that you do not wish to receive targeted advertising based on your overall internet usage. For more information about DNT and how it works, please visit the Future of Privacy Forum's website: <http://www.allaboutdnt.com/>.

We will make a good faith reasonable effort to honor your DNT browser settings for opting out of receiving targeted third party advertising based on your overall Internet usage. Please note that various browsers frequently update technology or change their settings and business practices without advance notice, and we may not have the latest information on how to honor your preferences. If you exercise either opt-out option – the cookie opt-out or the browser opt-out – you will continue to receive advertising, but such advertising may not relate to your specific interests, previous purchases, or search history.

However, you cannot opt-out of our contextual analytics and advertising, which is based on your usage of only our Services. We will continue to serve you contextual advertising. We will also continue to monitor your usage and search or transaction history to provide us with analytics on how well our Services, features, and activities are functioning and used. We will also share this information in an aggregated or anonymized form (meaning that no one individual person can be identified) within the IATF.

You can also opt out of our marketing emails at any time by contacting us at: [contact\\_us@iaob.org](mailto:contact_us@iaob.org) or by sending us a post card to **"OPT OUT", International Automotive Task Force, 26200 Lahser Road, Suite 320, Southfield Michigan 48033.**

### *11. How Do You Correct and Update Your Personal Data?*

We aim to keep all personal data that we hold accurate, complete and up-to-date. While we will use our best efforts to do so, we encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete or out-of-date, please contact: [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

You can change or correct your personal data at any time. Just send an email with your old information and your corrections to [contact\\_us@iaob.org](mailto:contact_us@iaob.org) with "Correction" in the subject line.

## ***12. What is Our Privacy Policy If You Are an Underage Child?***

We understand the importance of protecting the privacy of all individuals, especially the very young. Our services are intended for United States audiences over the age of 18. Our Site and its Services are not directed to children, and you may not use our Services if you are under the age of 13. You must also be old enough to consent to the processing of your personal data in your country (in some countries we may allow your parent or guardian to do so on your behalf). You must be at least 16 years of age to use the Site Forums. Subscribing to our Services is restricted to adults who are either 18 years of age or older or as otherwise legally defined by the country of your residency.

## ***13. What Happens When You Link to a Third-Party Web Site?***

If you click on a link and go to another site, you will be subject to that website's privacy policy. We encourage you to read the posted privacy policy statement at any website **before** submitting any personal data at all.

## ***14. Your California Privacy Rights***

We have adopted the following disclosures comply with the California Consumer Privacy Act of 2018, as amended, and implementing regulations ("CCPA") and other California privacy laws. Any terms defined in the CCPA, other California privacy laws, or in our Privacy Policy have the same meaning when used in this notice.

***The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.***

### **How to Exercise Your Rights Under the CCPA**

Under the CCPA you have the right to find out about the personal information that we have collected and how that information has been used or disclosed. You also have the right to request that we delete your personal information. If you wish to exercise any of the rights listed below, or if you would like additional information, please contact us at [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

#### ***1. The Right to Access and Know About Personal Information Collected, Disclosed, or Sold***

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. 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 (also called a data portability request).
- If we disclosed your personal information for a business purpose, identifying the personal information categories that each category of recipient obtained.

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.

## **2. *The Right to Request Deletion of Your Personal Information***

Subject to certain exceptions, you have the right to request that we delete any of all of your personal information that we collected from you and retained over the past 12 months. 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. You may request that only a portion of your information be deleted.

We may deny all or part of 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 service that you requested, take actions reasonably anticipated based on our ongoing business relationship with you, or otherwise perform our agreement 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 or ensure the right of another consumer to exercise their right of free speech or other right provided for by law
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with Frontier Airlines
- Comply with law or a legal obligation
- Otherwise use your personal information internally, in a lawful manner that is compatible with the context in which you provide the information.

## **3. *The Right to Opt-Out of the Sale of Your Personal Information***

### **“DO NOT SELL MY INFORMATION”**

The CCPA provides you with the right to opt out and stop businesses from selling your personal information. This right applies to all California consumers ages 16 or older and may be exercised at any time.

We do not sell your personal information.

While there is not yet a consensus, data practices of third-party cookies and tracking technologies associated with our websites and mobile app may constitute a “Sale” of your personal information as defined by the CCPA. You can exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad limitation choices. In addition, third party tools may enable you to search for and opt-out of some of these trackers, such as the Ghostery browser plug-in available at [www.ghostery.com](http://www.ghostery.com). You can learn more about your choices regarding certain kinds of online interest-based advertising in our privacy policy. We do not represent that these third party tools, programs or statements are complete or accurate, clearing cookies or changing settings may affect your choices and you may have to opt-out separately via each browser and other device you use.

Some browsers have signals that may be characterized as do not track signals, but we do not understand them to operate in that manner or to represent a “do not sell” request by you; accordingly, currently we do not view these signals as a do not sell request. We understand that various parties are developing do not sell signals and we may recognize certain such signals if we conclude such a program is appropriate.

We do not knowingly sell the personal information of consumers. All consumers, regardless of age, may opt out of our emails by clicking the ‘unsubscribe’ link on each of our emails.

#### **4. The Right to Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights, and will not engage in the following behaviors:

- Denying you goods or services
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Providing you a different level or quality of goods or services
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services

When you exercise these rights and submit a request to us, we will verify your identity by asking for information about your relationship with the IATF, such as email address on file.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

#### **Authorized Agents**

You may authorize a natural person or a business entity registered with the California Secretary of State to act on your behalf to make a request to know or to delete your personal information.

To do so, you must (i) verify your identity to the IATF and provide that authorized agent written permission to make such a request or (ii) provide the authorized agent with power of attorney pursuant to the California Probate Code sections 4000 to 4465.

The authorized agent must include those authorizations in the verifiable consumer request.

#### **Children 16 and Under**

We do not knowingly collect, solicit, or share personal information from children under the age of 16. If we have knowledge that a child under 16 has submitted personal information in violation of this Policy, we will delete that information as soon as possible. If you believe we may have obtained information in violation of this Policy, please email us at [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

Questions About The CCPA?

If you have questions or concerns regarding this statement, you should first contact us via email at [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

#### **California Shine the Light Law**

If you are a California resident and have an established business relationship with us and want to receive information about how to exercise your third party disclosure choices, you must send a request to the following address with a preference on how our response to your request should be sent (email or postal mail). You may contact us in two ways. Send an email to [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

Alternatively, you may contact us at:

International Automotive Task Force  
26200 Lahser Road, Suite 320  
Southfield Michigan 48033  
USA

Attn: Your California Privacy Rights

c/o Privacy Administrator

**For requests sent via email, you must put the statement “Your California Privacy Rights” in the subject field of your email. All requests sent via postal mail must be labeled “Your California Privacy Rights” on the envelope or post card and clearly stated on the actual request.** For all requests, please include your name, street address, city, state, and zip code. (Your street address is optional if you wish to receive a response to your request via email. Please include your zip code for our own recordkeeping.) **We will not accept requests via the telephone or by facsimile.** We are not responsible for responding to notices that are not labeled or not sent properly, or do not have complete information.

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [contact\\_us@iaob.org](mailto:contact_us@iaob.org). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

### *15. Your European Union Privacy Rights*

If you are in the European Union, under the General Data Protection Regulation (Regulation EU 2016/679) (also known as GDPR), you may have certain rights as a data subject. A data subject is a person who can be identified by a name, identification number, location, online identifier, or other physical, physiological, genetic, mental, economic, cultural or social identity of the person. Under the GDPR, personal data is information that relates to a data subject. The processing of your data is either based on your consent or in case the processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract, cf. GDPR art. 6(1)(a)-(b). If the processing is based on your consent, you may at any time withdraw your consent by contacting us at [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

In order to enter into a contract to use our Services, you must provide us with the required personal data. If you do not to provide us with all the required information, it will not be possible to deliver the Service.

To request information about or avail yourself of those rights, please send an email to [contact\\_us@iaob.org](mailto:contact_us@iaob.org) with "GDPR Request" in the subject line. In the email please describe, with specificity, the GDPR right you are requesting assistance with. Please note additional information may be requested prior to initiation of a request and that COMPANY reserves the right to charge a fee with respect to certain requests. Upon the IATF's completion of its review you will be notified if your request has been granted, denied, or exemptions apply.

#### ***The Data Controller and Processor for Personal Data***

A Data Controller is a company that collects people's personal data and makes decisions about what to do with it. A Data Processor is a person or company that deals with personal data as instructed by a Data Controller for specific purposes and services. The Data Controller's information is as follows:

COMPANY NAME: International Automotive Oversight Breau  
ADDRESS: 26200 Lahser Road, Suite 320  
CITY, STATE, ZIP: Southfield, Michigan 48033 U.S.A.  
EMAIL: [contact\\_us@iaob.org](mailto:contact_us@iaob.org)  
PHONE: +1 248 799 3939

The Data Processor's information is as follows:

COMPANY NAME: MailChimp  
ADDRESS: 675 Ponce De Leon N.E., Suite 5000  
CITY, STATE, ZIP: Atlanta, Georgia 30308 U.S.A.  
EMAIL: [www.mailchimp.com](http://www.mailchimp.com)

### ***The Purpose and Legal Basis for Collection***

Under the GDPR, there must be a lawful basis for processing personal data. There are six lawful bases, and they are consent, contract, legal obligation, vital interests, public task, and legitimate interests. For more information, see Section 1-3 of our Privacy Policy above.

### ***The Legitimate Interest***

For more information, see Section 1-3 of our Privacy Policy above.

### ***Recipients of Your Data and Categories of Data Collected***

For more information, see Section 1-3 of our Privacy Policy above.

### ***Transferring personal data from the EU to the US or other jurisdictions***

The IATF has its headquarters in Southfield, Michigan, USA. Personal data we collect from you will be processed in the United States. The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. The IATF relies on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, the IATF collects and transfers to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of the IATF in a manner that does not outweigh your rights and freedoms. We endeavor to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with us and the practices described in this Privacy Policy. The IATF also minimizes the risk to your rights and freedoms by not collecting or storing sensitive information about you.

### ***The 8 Rights of Individuals***

Under the GDPR, You will benefit from increased rights including:

#### ***1. The right to be informed***

The right to be informed encompasses the obligation to provide you with 'fair processing information.' It emphasizes the need for transparency over how your personal data is used.

#### ***2. The right of access***

Under the GDPR, you will have the right to obtain confirmation that your data is being processed, access to your personal data, and other supplementary information.

### 3. *The right to rectification*

You are entitled to have your personal data rectified if it is inaccurate or incomplete.

### 4. *The right to erasure*

The right to erasure is also known as ‘the right to be forgotten.’ You may request the deletion or removal of personal data where there is no compelling reason for its continued processing.

### 5. *The right to restrict processing*

We are permitted to store your personal data, but not further process it without consent.

### 6. *The right to data portability*

The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. You may move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

### 7. *The right to object*

You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling), direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

### 8. *Rights in relation to automated decision making and profiling*

The GDPR provides safeguards for you against the risk that a potentially damaging decision is taken without human intervention.

## ***16. What If You Have Questions?***

If you have questions or concerns regarding this statement, you should first contact the IAOB via email at [contact\\_us@iaob.org](mailto:contact_us@iaob.org).

Telephone: 1 248 799 3939

Address: International Automotive Task Force  
26200 Lahser Road, Suite 320  
Southfield Michigan 48033  
USA