

**COYOTE SECURE SERVICE
PERSONAL DATA PROTECTION POLICY
COYOTE SYSTEM**

Update version: April 2, 2026

1. Preamble

In accordance with the UK Data Protection Act 2018 (DPA 2018), the Client is informed by this Privacy Policy of the processing of its Personal Data by COYOTE SYSTEM, in its capacity as Data Controller in the context of its subscription to the COYOTE SECURE Service.

For any request related to personal data:

gdpr@coyote-group.com

COYOTE SYSTEM

Legal

25 Quai Gallieni

92150 Suresnes

FRANCE

2. Definitions

"**COYOTE Data**" refers to the data provided, reported and processed by the COYOTE Terminal or Application, i.e. the position of the vehicle (latitude, longitude, speed, heading), the type of vehicle set by the Customer, the Customer's country of registration, trip data, speed data in compliance with the authorized speed limits, routes, data relating to alerts received, reported and confirmed and information transmitted by COYOTE SYSTEM or by the Client.

"**COYOTE Overlay**" means the simplified version of the Coyote App using the Android operating system that allows it to be displayed simultaneously with other applications.

"**COYOTE SECURE Device**" means the electronic equipment marketed by COYOTE SYSTEM (directly or indirectly) and allowing access to the COYOTE SECURE service (excluding the COYOTE Application) as defined on the COYOTE Site.

"**COYOTE SECURE Service**" refers to all the services and offers provided by COYOTE SYSTEM by means of the Device with TRAQUEUR® technology, allowing the location and recovery of stolen vehicles.

"**COYOTE Site**" means the websites operated by COYOTE SYSTEM

"**Customer or Customers**" refers to any natural or legal person using the COYOTE SECURE Service.

"**Data Controller**" means COYOTE SYSTEM, a simplified joint-stock company with a share capital of €3,412,340.40, identified under number 518 905 476 in the Nanterre Trade and Companies Register and whose registered office is located at 25 quai Gallieni in Suresnes (92150).

"**Data Subject(s)**" means the Customer(s) of COYOTE SYSTEM whose Personal Data is processed by COYOTE SYSTEM.

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25 Quai Gallieni | 92150 SURESNES, FRANCE | Simplified Joint Stock Company with a capital of €3 412 340,40
| RCS Nanterre 518 905 476 | SIRET 51890547600173 | TVA FR 09518905476 mycoyote.co.uk

"Equipment" of the Client refers to the Client's technical, material and accessory environment in which the COYOTE Terminal and/or the COYOTE SECURE device is intended to be used under the sole responsibility of the Client. The Client's Equipment includes, in addition to the Client's vehicle (including two-wheeled vehicles with a cylinder capacity of more than fifty (50) cubic centimetres), all on-board equipment, including electronic and computer equipment that may equip the said vehicle.

"Legal Bases" means the legal basis(s) on which the processing of Customer Personal Data is based.

"Personal Data" refers to data that allows the identification of Customers directly or indirectly and which is processed by COYOTE SYSTEM.

"Processing" refers to the operations (collection, recording, organization, storage, adaptation, modification, extraction, consultation, use, communication by transmission or dissemination or any other form of making available, reconciliation of Customers' Personal Data carried out by COYOTE SYSTEM.

"Products" means all products, other than COYOTE branded products, distributed within the COYOTE point of sale network.

"Purposes" refers to the purposes pursued by COYOTE SYSTEM when processing Customers' Personal Data.

"Recipients" means all entities that will access Customers' Personal Data other than public, tax, social, administrative and judicial authorities. These are the internal services of the Data Controller and its service providers/partners.

3. Description of the processing of the Customer's Personal Data

3.1. Personal data collected

COYOTE SYSTEM processes the following Personal Data of the Customer:

- a) identification data (title, surname, first name, e-mail address, full postal address, telephone number, vehicle license plate), bank data (credit card number, expiry date and security code – bank and IBAN code), commercial data (data relating to the shopping cart / purchase history (type of Product purchased, quantity, date, location, sales channels (Coyote Stores, Website), type of COYOTE box(s) purchased, type of subscription(s), customer number, billing data.

In the event of a report of vehicle theft within the framework of the COYOTE SECURE Service: date and time of the theft, circumstances of the theft, type of vehicle(s) stolen, geolocation data of the stolen vehicle(s) (if applicable), information relating to the filing of a complaint.

- b) COYOTE data: geolocation data of the Client's vehicle (latitude, longitude, speed, heading, COYOTE Terminal identifier), type of COYOTE Terminal or Application used, type of vehicle set up by the Client, country of registration of the Client, journey data, speed data in compliance with the authorised speed limits, routes, data relating to alerts received, declared and confirmed by the Client.

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3.2. Purposes of the processing

The Customer's Personal Data is processed by COYOTE SYSTEM, in its capacity as data controller, for the following purposes:

- development and improvement of the COYOTE SECURE Service;
- promotion of the COYOTE SECURE Service (sending offers/promotional operations, sponsorships, advertising campaigns, competitions, sweepstakes, satisfaction surveys/Customer questionnaire(s));
- sale and provision of the COYOTE SECURE Service;
- management of the commercial/customer relationship between the Client and COYOTE SYSTEM;
- management of the Customer's after-sales service / complaint(s);
- management of sales of COYOTE Products and Application in Coyote Stores;
- sales statistics COYOTE SECURE service;du
- management of theft reports, searches and recovery of stolen vehicle(s) (COYOTE SECURE offer);
- management of requests for rights of access, portability, erasure, limitation of processing, rectification of the processing of Personal Data;
- Management requests for the right to object to commercial prospecting ;

The Client is informed that the Company provides an instant messaging service (webchat) on the Website. This webchat is a discussion tool through which the Client can obtain from a telephone advisor of the Company targeted answers to the most frequently asked questions about the Company and/or about COYOTE Products and Services. When the Client uses this webchat, the Company collects, in its capacity as data controller, the following personal data:

- Content of questions asked via webchat;
- Date and time of the questions asked via the webchat.

The company publishing the webchat is the company IADVIZE, whose contact details are as follows: Société IADVIZE, Euronantes Gare, Le Berlingot bât. B - 9 Rue Nina Simone, 44000 Nantes, France, contact@iadvize.com, +33 (0)2 85 52 65 45.

3.3. Legal basis (lawfulness of processing)

The processing of Customers' Personal Data based on COYOTE SYSTEM's legitimate interests is as follows:

- promotion of the COYOTE and COYOTE SECURE Service (sending offers/promotions, sponsorships, advertising campaigns, competitions, sweepstakes, lotteries, satisfaction surveys/Customer questionnaire(s));
- development and improvement of the COYOTE SECURE Service;
- statistics on sales of COYOTE SECURE Products, Services;

The processing of Customers' Personal Data based on the performance of the contract concluded between the Customer and COYOTE SYSTEM is as follows:

- management of the commercial/customer relationship between the Client and COYOTE SYSTEM;

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- management of the Customer's after-sales service / complaint(s);
- sale and supply of the COYOTE SECURE Service
- management of theft reports, searches and recovery of stolen vehicle(s) (COYOTE SECURE offer) , communication aux forces de l'ordre des données d'identification et de géolocalisation des véhicules équipés et le cas échéant des plaintes effectuées auprès des autorités.

Processing of Customers' Personal Data based on a legal obligation to which COYOTE SYSTEM is subject are as follows:

- management of requests for rights of access, portability, erasure, limitation of processing, rectification of the processing of Personal Data;
- management of requests for the right to object to commercial prospecting.

3.4. Retention of Personal Data

The Customer's Personal Data is kept for the following periods:

Identification data: identification data is kept for a period not exceeding the duration of the Client's commercial relationship with COYOTE SYSTEM.

For the management of complaints : for a period of thirteen (13) months after payment, following the date of debit, or fifteen (15) months in the case of deferred debit payment cards.

Direct debit (SEPA) information is kept for a period of ten (10) years from the last SEPA direct debit issued by COYOTE SYSTEM.

Commercial data: commercial data is kept for a period not exceeding the duration of the Client's commercial relationship with COYOTE SYSTEM and for a maximum period of three (3) years from the last contact with the Client.

Commercial data related to advertising campaigns, competitions, sponsorships and promotional offers are kept until the withdrawal of the Client's consent or for three (3) years from the last contact with the Client.

Commercial data related to the performance of quality studies/surveys, testing of the COYOTE / COYOTE SECURE Products and Service, and sales statistics are kept for the time necessary to carry out the study or until the Customer exercises the right to object or withdraw consent.

Billing Data: Billing Data is retained for a period of ten (10) years.

Data collected in the event of a theft report (COYOTE SECURE Service): the data is kept for a period that does not exceed the duration of the Customer's commercial relationship with COYOTE SYSTEM and may be kept for a longer period by COYOTE SYSTEM ((six) (6) years) for evidentiary purposes.

In order to ensure the efficiency and speed of the COYOTE SECURE Service, certain data is communicated to the police. In order to comply with the statute of limitations for criminal offences, and to be able to be used for evidentiary purposes, this data is kept for a period of (five) (5 years) after the transmission of the theft report.

Data collected in the context of the Customer's exercise of rights over its Personal Data : les données sont conservées jusqu'à un (1) an à compter de la demande d'exercice de droit et jusqu'à trois (3) ans à compter de l'exercice du droit d'opposition.

Customers' Personal Data is kept by COYOTE SYSTEM only for the aforementioned periods.

COYOTE SYSTEM may retain certain Personal Data in order to comply with its legal or regulatory obligations for archiving purposes, in order to allow it to exercise its rights and

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defend itself in the event of litigation and/or for statistical or historical purposes (in compliance with the applicable limitation periods).

At the end of these periods, the Personal Data will be deleted by COYOTE SYSTEM.

3.5. *Rights over Personal Data*

COYOTE SYSTEM guarantees the Customer concerned by the processing of his Personal Data the right to be informed and to access the Personal Data concerning him/her, the right to rectification and erasure, the right to limit processing, the right not to be subject to automated data processing intended to define his/her profile or to evaluate certain aspects of his/her personality, the right to issue advance directives on the fate of his Personal Data (before his death) as well as the right to portability, which must be strictly understood as Personal Data collected directly from the Client.

The Client also has the right to object to the processing of his or her Personal Data within the limits of the legal obligations imposed on COYOTE SYSTEM.

The Client may exercise their rights or ask questions about the processing of their Personal Data by COYOTE SYSTEM by sending a letter to the following address: COYOTE SYSTEM – Personal Data Protection Officer – 25 quai Gallieni – 92150 SURESNES or by sending a request to the following email address: gdpr@coyote-group.com

In the event of concerns or complaints from the Client regarding the protection of their personal data, the Client has the right to lodge a complaint with the following link: Information Commissioner's Office (ICO) [Information Commissioner's Office](#)

The CNIL can also be reached at the following contact details Information Commissioner's Office, Wycliffe House/ Water Lane/ Wilmslow / Cheshire SK9 5AF/ United Kingdom

The Client is invited to inform the Company's Data Protection Officer in advance so that the latter can process your request and try to find an amicable solution.

3.6. *Access to Personal Data and Transfer(s) of Personal Data*

3.6.1. Access to the Client's Personal Data is restricted to only those persons who need its Personal Data, in particular authorized personnel of COYOTE SYSTEM. COYOTE SYSTEM reserves the right to transmit its Customers' Personal Data to its partners supporting its activity, in order to manage the Customer relationship, the after-sales service, the various partnerships and in order to improve the COYOTE Service.

3.6.2. *Other Data Transmissions*

As part of the COYOTE SECURE Service, the Customer is informed that in the event of a declaration of theft of his vehicle, and the search for it by COYOTE SYSTEM in partnership with the police forces, the data relating to the vehicle and the theft report may be transmitted to the police forces, to the employees or authorized service providers of COYOTE SYSTEM in charge of these searches (detectives) as well as to the competent judicial authorities.

Some service providers/partners that COYOTE SYSTEM uses, in particular for the management of its service and its customer relationship / after-sales service, are located outside the European Economic Area (Morocco, Madagascar, United States).

COYOTE SYSTEM is committed to ensuring a level of protection of the Customer's Personal Data identical to the level of protection provided by the

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application of the GDPR, and has in particular entered into Standard Contractual Clauses with companies located outside the European Economic Area, as amended in June 2021 by the European Commission, and has put in place additional security guarantees as established by the judgment of the Court of Justice of the European Union (CJEU) of 16 July 2020 (known as the "Schrems II" judgment).

4. Security of Personal Data

COYOTE SYSTEM ensures the security of the Client's Personal Data by implementing appropriate technical and organizational measures in order to guarantee a level of security appropriate to the risk and implements means to guarantee the constant confidentiality, integrity, availability and resilience of the processing systems and services, any means to restore the availability of and access to the Client's Personal Data, as well as a procedure for regularly testing, analysing and evaluating the effectiveness of the technical and organisational measures put in place.

5. Hosting of Personal Data

The Customer's Personal Data is hosted in France by COYOTE SYSTEM and in Morocco and Madagascar (for the management of after-sales service and customer relations). COYOTE SYSTEM has ensured that its service providers in Morocco and Madagascar comply with the GDPR and has put in place the appropriate and necessary security guarantees for the hosting of the Client's Personal Data in Morocco and Madagascar.

6. Links to Third-Party Sites

In order to improve the quality of the Site, the Company may include links to third-party sites on the Site. These sites have a privacy policy that is different from and independent of the Company's. You are encouraged to review the Privacy Policy of the third-party sites you visit.

7. Cookies

The provisions relating to the deposit of cookies on the Site are set out in the Cookie Management Policy available on the Site.

8. Changes to the Privacy Policy

This Privacy Policy may be modified. The Company therefore advises you to regularly consult this page of the Site. In the event of a material change to the Privacy Policy, the Company will notify you of such changes.

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