# Privacy Notices for Specific Activities

## Article 13 GDPR Notice concerning Personal Information contained within Road Clips

### Identity, Contact Details and Representative of Controller

The controller is *Mobileye Vision Technologies Ltd*. of Hartom 13, Jerusalem, 9777513, Israel, email: [privacy@mobileye.com](mailto:privacy@mobileye.com). The controller’s representative within the EEA is its affiliate *Mobileye Germany GmbH* of Emanuel-Leutze-Str. 21, 40547 Düsseldorf, Germany.

### Collection of Road Clips

Certain test-vehicles operated by Mobileye itself or by our customers are fitted with prototype products which, as those vehicles are driven along the road, collect and store a video-recording of the outside of the vehicle in the form of a series of short clips (“**Clips**”). Naturally, Clips often contain personal information (“**PI**”, which is information relating to an identified or identifiable natural person, e.g., a facial image or a vehicle license-plates). In the case of customer-operated test-vehicles, Clips are conveyed to us via secure file transfer or on physical disks. (Mobileye customers may also retain copies of Clips, recorded by a Mobileye product, for their own internal purposes.)

### What does Mobileye do with Clips ? (the ‘purpose of processing’)

Mobileye uses Clips for internal product development, validation, testing and research purposes. In particular, we use them to ‘train’ and test our technology; principally, to improve its accuracy at identifying the various objects found on the road. Thus, to the extent that Clips contain PI, Mobileye is interested in it only in its generic form (that is, the generic shape or appearance of a face or a license-plate, not the details of a particular face or license-plate), so that, for example, our technology can become even better at identifying pedestrians and distinguishing them from other road traffic.

### Mobileye’s Minimization of PI

Mobileye takes various steps to minimize the very amount of PI contained within Clips in the first place, e.g. by compression. (Non-compressed Clips are nonetheless retained, but used only to stress-test innovative Mobileye code against ‘real life’ footage – for example, a Mobileye developer might wish to test an innovation in pedestrian detection against a large number of Clips containing rainy nighttime scenes, in which weather pedestrians are inherently less visible. In this case, the new code is simply executed against Clips ‘in the background’ and the developer sees only the results.)

### What is Mobileye’s legal basis for collection and use of Clips ? (the ‘legal basis for the processing’)

Mobileye has a legitimate interest in collecting and using the Clips for the above purpose, which is to improve our technology powering advanced driver assistance solutions and due eventually to power autonomous vehicles, which are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

### Transfer of Clips outside of Mobileye (‘categories of recipients of personal information’)

Clips ‘leave’ Mobileye in only a few, specific scenarios:

1. Where Clips are stored with third party processors, leveraging such processors’ massive computing power and real-time scalability; or
2. Where Mobileye shares a small number of them, *in compressed form*, with off-site employees in Israel or external contractors, for the purpose of tagging, i.e., where humans ‘tag’ certain features of a Clip in order to train and refine Mobileye software’s identification accuracy; or forafter-the-fact review of computerized tagging, i.e. where humans review and check Mobileye software’s identification accuracy; or
3. Where Mobileye shares a very small number of individual Clips with third-party customers or partners for business-related purposes; or
4. Where, in order to demonstrate how Mobileye technology works, Clips are featured on Mobileye’s various websites or social media channels, or senior Mobileye officers play them before an audience of customers or potential customers, or at a corporate or trade event. In any event, the number of Clips involved is minimal.

Transfer of Clips under sub-sections ‎(i)-‎(iii) is done either (i) through upload to and download from secure private services such as AWS (and not through third-party web-based services such as Dropbox) or (ii) by sending hard disks with reputable international couriers such as FedEx (some of which disks are themselves secured through encryption or similar means).

In the case of transfer of Clips to third countries, Mobileye relies on a mixture of European Commission adequacy decisions and standard data protection clauses.

### Clip Retention Duration

Mobileye retains the Clips for as long as they continue to be useful for the purposes stated above.

### Individuals’ Rights in respect of their PI contained within a Clip or Clips

Individuals have various rights under the GDPR in respect of PI pertaining to them. However, please note that these rights are necessarily limited due to the fact that Mobileye neither collates nor indexes PI (there is no mechanism allowing, for example, a search through the Clips database for a frame or frames containing any particular vehicle or individual). As a result, it is highly unlikely that Mobileye would be able to identify a particular individual within its Clips database unless that individual could provide additional information, such as the location and time at which he/she believes the relevant Clip or Clips were collected\*.

Nonetheless, Mobileye will respond to any requests on a case-by-case basis.

\*In the unusual case where an individual registers an objection with the driver of a Mobileye-operated test-vehicle in real or close-to-real time, drivers are instructed to make a record of such objections and to relay them to us for review. In such exceptional case, by contrast to the above, it would usually be possible to identify and delete the relevant Clip or Clips.

### Individuals’ Right to Lodge a Complaint

An individual may lodge a complaint with their local supervisory authority. A list of supervisory authorities (correct at the time of publication of this Notice) may be found [here](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## Article 14 GDPR Notice concerning Personal Information contained within Road Segment Data collected by OEM Vehicles

### Identity, Contact Details and Representative of Controller

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### What is Road Segment Data ?

Certain vehicles collect and transmit data about their driving path, which we call ‘road segment data’ or RSD. RSD is a mathematical representation (strings of alphanumeric metadata) of the streetscape, containing the location of various static, non-transient road landmarks around the vehicle, such as traffic lights and road signs, as well as dynamic data such as the existence of potholes, parking spaces etc.

Each piece of RSD also contains a date, time, and GPS stamp.

### What is an OEM Vehicle and which OEM Vehicles collect RSD ?

An OEM Vehicle is a vehicle into which Mobileye technology is integrated, by its manufacturer, during manufacture (as opposed to “**Aftermarket Fleet Vehicles**”, vehicles into which Mobileye’s aftermarket Mobileye 8 Connect™ is retrofitted after manufacture). OEM Vehicles running software on certain iterations of Mobileye’s EyeQ® chip collect RSD.

Note: The collection of RSD by Aftermarket Fleet Vehicles is addressed [in a separate notice](#_Article_13_GDPR).

### Does OEM Vehicle RSD contain personal information (“PI”, being information relating to an identified or identifiable natural person) ?

It is the manufacturer of the relevant OEM Vehicle which first receives the RSD. Before transmitting the RSD to Mobileye, the manufacturer strips the RSD of any potential PI (even for itself) in some or all of the following ways: (i) obfuscating the vehicle’s identity, (ii) deleting RSD pertaining to the first few and last few minutes of a journey, and (iii) removing a pro rata portion of each journey – e.g. 1 km in every 10 km.

Therefore, Mobileye firmly believes that the RSD that we receive from OEM-Vehicle manufacturers is free of PI – Mobileye simply has no way, alone, of relating any particular RSD back to the OEM Vehicle which collected it. Nonetheless, this Notice continues on the basis that the RSD that Mobileye receives from OEM-Vehicle manufacturers does in fact contain PI.

### What does Mobileye do with RSD ? (the ‘purpose of processing’)

Mobileye aggregates and reconciles the continuous stream of RSD received from relevant vehicles, resulting in a highly-accurate and virtually real-time map called a “Roadbook™”.

### What is Mobileye’s legal basis for collection and use of RSD ? (the ‘legal basis for the processing’)

Mobileye has a legitimate interest in collecting and using the RSD, an essential element of the autonomous and quasi-autonomous vehicle ecosystem. Autonomous vehicles are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

### Transfer of RSD outside of Mobileye (‘categories of recipients of personal information’)

Mobileye may share ‘raw’ RSD with, for example, mapmakers. However, such raw RSD, and, *a fortiori*, a Roadbook derived from aggregated and reconciled RSD certainly contain no PI. In the case of transfer of RSD to third countries, Mobileye relies on a mixture of European Commission adequacy decisions and standard data protection clauses.

### RSD Retention Duration

As stated above, the main use of RSD is in its aggregation and reconciliation into a Roadbook. Raw RSD is nonetheless retained for as long as it continues to be useful.

### Individuals’ Rights in respect of their PI

Individuals have various rights under the GDPR in respect of PI pertaining to them. Mobileye will respond to any requests to exercise these rights on a case-by-case basis.

### Individuals’ Right to Lodge a Complaint

An individual may lodge a complaint with their local supervisory authority. A list of supervisory authorities (correct at the time of publication of this Notice) may be found [here](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## Article 13 GDPR Notice concerning Personal Information contained within Road Segment Data collected by Aftermarket Fleet Vehicles

### Identity, Contact Details and Representative of Controller

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### What is Road Segment Data ?

Certain vehicles collect and transmit data about the vehicle’s driving path, which we call ‘road segment data’ or RSD. RSD is a mathematical representation (strings of alphanumeric metadata) of the streetscape, containing the location of various static, non-transient road landmarks around the vehicle, such as traffic lights and road signs, as well as dynamic data such as the existence of potholes, parking spaces etc.

Each piece of RSD also contains a date, time, and GPS stamp, and, in the case of collection by Aftermarket Fleet Vehicles, the serial number of the Mobileye system which collected it.

### What is an Aftermarket Fleet Vehicle and which Aftermarket Fleet Vehicles collect RSD ?

An Aftermarket Fleet Vehicle is a vehicle belonging to a corporate fleet into which Mobileye’s aftermarket Mobileye 8 Connect™ is retrofitted after manufacture (as opposed to “**OEM Vehicles**”, vehicles into which Mobileye technology is integrated, by its manufacturer, during manufacture). Aftermarket Fleet Vehicles collect RSD.

Notes: The collection of RSD by OEM Vehicles [is addressed in a separate notice](#_Article_14_GDPR). The Mobileye 8 Connect may in future also collect telematics data; this will be addressed in a separate notice which will be published at that time.

### Does Aftermarket Fleet Vehicle RSD contain personal information (“PI”, being information relating to an identified or identifiable natural person) ?

Unlike in the OEM Vehicle case, Mobileye receives RSD directly from Aftermarket Fleet Vehicles, but the RSD reveals only the serial number of the specific Mobileye 8 Connectsystems fitted into those Vehicles. Except as set out below, Mobileye has no way of linking the relevant systems to the Vehicles into which they are fitted as the systems’ serial numbers bear absolutely no relationship to any identifying feature (e.g. the license number) of the Vehicles carrying them. In any event, the serial numbers of the specific Mobileye 8 Connectsystems are irrevocably deleted shortly after receipt of the relevant RSD.

There is one exception: where the owner of specific Vehicles has specifically allowed for this, Mobileye will ‘associate’ the systems to the *fleet* to which those Vehicles belong, by replacing the system serial numbers with an identifier of the relevant fleet. So, in that case, Mobileye will be aware that particular RSD was collected by a vehicle belonging to a particular fleet, *but not which specific vehicle*.

All RSD sent to Mobileye is protected in transit by technical and organizational measures.

Thus, the only situation in which RSD contains PI is where it is ‘associated’ to a particular fleet. Nonetheless, this Notice continues on the basis that the RSD that Mobileye receives from Aftermarket Fleet Vehicles does in fact contain PI.

### What does Mobileye do with RSD ? (the ‘purpose of processing’)

Mobileye aggregates and reconciles the continuous stream of RSD received from relevant vehicles, resulting in a highly-accurate and virtually real-time map, called a “Roadbook™”.

### What is Mobileye’s legal basis for collection and use of RSD ? (the ‘legal basis for the processing’)

Mobileye has a legitimate interest in collecting and using the RSD, an essential element of the autonomous and quasi-autonomous vehicle ecosystem. Autonomous vehicles are expected to lead to the indisputable social benefit of vastly reduced road casualties and fatalities.

### Transfer of RSD outside of Mobileye (‘categories of recipients of personal information’)

Mobileye may share ‘raw’ RSD with, for example, mapmakers. However, such raw RSD, and, *a fortiori*, a Roadbook derived from aggregated and reconciled RSD certainly contain no PI. In the case of transfer of RSD to third countries, Mobileye relies on a mixture of European Commission adequacy decisions and standard data protection clauses.

### RSD Retention Duration

As stated above, the main use of RSD is in its aggregation and reconciliation into a Roadbook. Raw RSD is nonetheless retained for as long as it continues to be useful.

### Individuals’ Rights in respect of their PI

Individuals have various rights under the GDPR in respect of PI pertaining to them. Mobileye will respond to any requests to exercise these rights on a case-by-case basis.

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