APTIV CONNECT QUALIFIER

Customer Data Retention Policy



Aptiv is committed to helping our customers protect their privacy, comply with relevant regulations, improve data security, and keep storage costs low.

To achieve these goals, we've established a two-year default data retention period for all customers. If you need to retain data for a longer period than the default retention period, we offer flexible options to meet your specific needs.

You can choose to extend the retention period on Aptiv's servers for a fee or opt to store the data on your own servers by purchasing API access or an external feed. If you have specific requirements or exceptions, we'll work with you to develop a customized solution that meets your needs.

BENEFITS

- **Protects your company by enhancing data privacy and security**
- **Helps ensure that your organization meets its legal and regulatory obligations**
- **Automates data deletion so that no manual intervention is necessary**
- **Keeps data storage costs low**
- **Makes data available for as long a duration as needed**

POLICY

In this data retention policy, we outline our default retention period, deletion window, and scope of in-scope data. We'll also notify you annually about the retention policy, so you can plan accordingly. If you have specific requirements or exceptions, we're happy to work with you to develop a customized solution that meets your needs.

Retention period

Aptiv Connected Services (ACS) applies a default "retention period" to all customers, after which all in-scope data (see section, "Data in-scope") is permanently deleted. The retention period is based on days since the source data was recorded.

The default retention period is 730 days (two years).

External feed

ACS applies a default "retention period" for external feed customers to retain the data based on the days since the source data was written. The default retention period is 90 days.

Deletion window

When the retention period elapses, ACS will complete the deletion of data within the "deletion window."

This allows for the deletion process to happen in bulk (i.e., not carried out daily) when required. Certain data (depending on storage and deletion methods) may be deleted immediately when the retention period elapses.

The default deletion window is 90 days.

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Note: The effect of this standard is that some data may be stored by ACS up to the combined <retention period + deletion window>. For example, with the default retention period (2 years) and deletion window (90 days), ACS will store all data for between 2 years and 2 years 90 days from the day it was recorded.

Exceptions to the deletion window

In rare cases where data is manipulated near the end of its <retention period + deletion window>, it is possible for that data to remain live for an additional period beyond the nominal retention <retention period + deletion window>. These manipulations include, for example, manual "reprocessing" of data into a customer "external feed" or user creation of a batch analysis (e.g., DATALAB) job containing the data. In these cases, a version of the data will remain on ACS servers for up to 90 days from the date of the reprocessing/analysis job.

Data in-scope

This standard applies to all raw data collected from a device under test (DUT) (e.g., a vehicle) using ACS vehicle data recorders (or recorded by alternative means and subsequently loaded into the ACS system) and all data subsequently derived from the raw data.

The standard excludes system log files, customer-provided data dictionary files (e.g., A2L, DBC, ARXML, etc.), artifacts generated by the ACS datalogger configuration application (i.e., Developer), and any other information not actually collected from (or subsequently derived from) a DUT and/or connected peripherals (e.g., camera, microphone, accelerometers, etc.).

The lists below outline some of the data elements included in this standard.

Database records:

- Vehicle trip history
- GPS history
- Vehicle event and DTC history
- Event video or audio links
- Snapshot data

File storage:

- All Trip, Trip Lite, and Event/DTC files of any file format. (This includes the raw data files as well as any transformed data files such as CSV, MDF, etc.)
- Audio files
- Video files

Customer notification

The customer will be sent an annual reminder of the ACS Customer Data Retention Standard. The sales team will be responsible for sending the annual reminder about the retention policy to the commercial customers on each account.

Previous Customers

Previous customers will follow the same retention period as above.

Exceptions to the standard

In the case of a legal hold, ACS may be required to not execute data deletion per this standard. In these cases, and when legally permitted, the customer will be notified.

If a customer requires a specific deviation from the standard retention period, the standard deletion window, or the data in-scope, those deviations must be documented in a Customer-Specific Data Retention Standard (or addendum to this Customer Data Retention Standard) and agreed to in writing by the customer and ACS.

ABOUT APTIV
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