

**Textron Specialized Vehicles Inc.**  
**(d/b/a Pace Technologies, LLC)**

**Privacy Notice**

**Last Updated and Effective:** November 18, 2025

We at Textron Specialized Vehicles Inc. (d/b/a Pace Technologies, LLC) (collectively, “**Pace**”, “**us**”, “**our**”, or “**we**”) are strongly committed to transparency, and we want you (“**you**” or “**your**”) to understand how we collect, use, share and protect your Personal Data (as defined below), as well as the rights and choices you have with respect to your Personal Data and how you can contact us to get answers to your questions.

This Privacy Notice applies to information we obtain in various contexts, both online and offline, including when you: (i) access, use, or otherwise interact with our web portal, interfaces, and/or any Pace products, devices, technologies, solutions, and features (collectively, the “**Services**”); (ii) purchase our Services; (iii) visit or use any applications or services that link to this Privacy Notice; (iv) interact or communicate with us; (v) sign up to receive marketing communications; (vi) interact with our advertising and marketing materials; (vii) participate in any of our programs or events; or (viii) otherwise submit information to us or through the Services. This Privacy Notice also applies to information we collect automatically as you and others navigate through and interact with our Services and from third parties.

Our Services capture information, including Personal Data (as defined below), about you and possibly other individuals if they are also using the Services or are in close proximity to you, such as if you or your caddie operate and use one or more Pace devices or a vehicle equipped with such device(s) (e.g., golf cart) or where a Pace device is affixed to you or your caddie’s person or equipment (e.g., a compact device carried by you or your caddie or otherwise affixed to your golf bag that offers precise locating ability while you and your caddie are on a golf course).

**BY ACCESSING OR USING OUR SERVICES, INCLUDING WHEN PLAYING AT A GOLF COURSE THAT UTILIZES PACE PRODUCTS OR TECHNOLOGIES, CARRYING OR AFFIXING A PACE DEVICE ON SOMEONE’S PERSON OR PERSONAL PROPERTY WHILE PLAYING AT A GOLF COURSE, OR UTILIZING A GOLF CART EQUIPPED WITH PACE PRODUCTS OR TECHNOLOGIES, YOU ACKNOWLEDGE AND UNDERSTAND THAT YOU ARE INTENTIONALLY DIRECTING US TO DISCLOSE YOUR PERSONAL DATA TO THE OWNER OF THE RELEVANT GOLF COURSE OR GOLF CART.** Please review the golf course’s privacy policy to understand how they use the Personal Data being collected. We have no control over, and are not responsible for, the actions and privacy policy of the golf course.

Similarly, please note that, in certain instances, we provide our commercial line of Services to public and private sector customers – i.e., local government officials, hotel resorts – as well as other services to golf courses (e.g., via a “Labor Portal” to enable those courses to effectively manage its staff and projects) – where we collect or otherwise process information (including Personal Data) solely on behalf of those customers. When we are collecting or otherwise processing information about you on behalf of our customers, we will only collect, use, and otherwise process such information as directed by our customers, as set forth in our contractual agreements with such customers, or as otherwise permitted by applicable law. **Accordingly, this Privacy Notice does not apply to the extent that we process your information, including any Personal Data, in the role of a processor or service provider (as such terms are defined by applicable privacy laws).**

**Thus, if you are a guest at a hotel resort using our Services on their golf course, an employee or other worker at a course that has implemented a Labor Portal, or otherwise work for a government official that utilizes and deploys our Services for their or your own use, this Privacy Notice does not apply to any information you provide or that is otherwise collected from or about you in those settings, as we merely process this information as part of the services we perform on behalf of our customers.** For detailed privacy information related to our processing of your Personal Data and other information on behalf of our customers that use our Services and/or Labor Portal (as applicable), please reach out to the relevant customer directly. We are not responsible for the data privacy or security practices of our customers, which may differ from those set forth in this Privacy Notice.

It is our policy to comply with applicable privacy laws, so our privacy practices may vary depending on where you live. Please see the jurisdiction-specific disclosures in – and attached to – this Privacy Notice for additional information that may apply to you depending on where you live. For certain products, services, and features, there may be additional notices about our practices and this Privacy Notice supplements any other privacy policies provided or communicated to you. Please read those additional privacy disclosures to understand how they apply to you. *If you are an employee, independent contractor, or job applicant of Pace, your information collected in those contexts will be subject to a separate privacy notice that we provide to you where and when appropriate.*

By using our Services, you acknowledge and agree to the terms of this Privacy Notice. If you do not understand or agree with the terms of this Privacy Notice, please do not use our Services. If you have questions about this Privacy Notice, please contact us before using, or continuing to use, our Services. Our Services may include links to websites and/or applications operated and

maintained by third parties. Please note that we have no control over the privacy practices of websites or applications that we do not own. We encourage you to review the privacy practices of those third parties.

We reserve the right to change our Privacy Notice from time to time by posting the changes here. If we choose to amend this Privacy Notice, we will revise the Last Updated and Effective date at the top of this Privacy Notice when we post the updated version. We may also provide you with notice by prominently posting on our website, via email or both, if we make any significant changes to this Privacy Notice. Your use of our Services after we have informed you in one of these ways that we made changes to our Privacy Notice will mean that you have accepted those changes.

- 
1. [TYPES OF INFORMATION WE COLLECT](#)
  2. [HOW WE COLLECT PERSONAL DATA](#)
  3. [HOW WE USE PERSONAL DATA](#)
  4. [HOW WE DISCLOSE PERSONAL DATA](#)
  5. [HOW WE PROTECT PERSONAL DATA](#)
  6. [THIRD PARTY WEBSITES AND APPLICATIONS](#)
  7. [DATA TRANSFERS](#)
  8. [CHILDREN'S PRIVACY](#)
  9. [DO NOT TRACK](#)
  10. [DATA RETENTION](#)
  11. [YOUR CHOICES AND CONTROLS](#)
  12. [CONTACT US](#)

[California Privacy Law Appendix](#)

[European Privacy Law Appendix](#)

---

## 1. TYPES OF INFORMATION WE COLLECT

We collect two basic types of information about you from various sources, such as directly from you when you provide it to us, automatically as you navigate, use or otherwise interact with our Services, or from third-parties: Personal Data and non-Personal Data.

Personal Data includes all information that relates to you or which are opinions about you personally and either identifies or may be used to identify you personally (collectively, “**Personal Data**”). The types of Personal Data we collect vary depending on our relationship with you, such as if you are one of our golf course customers or an end-user of Pace Services. We may only collect certain limited types of information from or about you depending upon your relationship with us (e.g., a Pace customer that utilizes and deploys our Services on its golf course or an individual end-user of Pace Services while on that course) and, where applicable, the Pace device or Pace-equipped vehicle you are using, how you interact with us, or use or interact with our Services, such as your:

- **Identifiers and Contact Information.** Name, postal address, email address, phone number, unique personal identifiers (e.g., Golf Handicap Information Network (GHIN) numbers, member number, etc.), IP address, photo(s) of you in connection with tee sheets, and other similar information.
- **Demographic Data.** Gender.
- **Participation Details.** Information about the courses you play at, dates and times of play, your scores, and information regarding your handicap.
- **Geolocation Data.** Automatically collected data from the Pace solutions in your golf cart (or any other vehicle equipped with Pace devices), or on Pace devices carried by or otherwise affixed to your or your caddie's person or personal belongings on a golf course (or to that of other individuals in your party) that includes your and/or their precise location data (e.g., physical movements on a golf course in real-time). Geolocation Data also includes IP-based general location data, which may be used to locate the city and state that you are in when you access our Services.
- **Usage Information.** Data you provide from your use of our Services, including information about food and beverage orders, music pairing, and the two-way messaging system, as well as maintenance-related data, and numerous signals from the Pace product or Service about its performance.
- **Inferences.** Inferences drawn from or created based on any of the information identified in this list to create a profile about, for example, your preferences (e.g., favorite food/beverages consumed on the course), behavior (e.g., cart driving), aptitudes (e.g., golf aptitude), abilities (e.g., pace of play), characteristics, and predispositions.

To view all of the categories of Personal Data we collect, [click here](#). We strive to uphold data minimization principles and only seek to collect Personal Data from you for the purposes described in this Privacy Notice.

Except as otherwise stated in any jurisdiction-specific appendix attached to this Privacy Notice, Non-Personal Data includes information that (i) has been anonymized, or (ii) does not otherwise personally identify you (including, but not limited to, information collected in connection with a business-to-business transaction involving Pace, such as (a) *business contact details* (e.g., company name, work phone number and/or email address, job title, etc.), (b) *commercial information* (e.g., Customer ID, record of customer purchases and Services, service schedules, other information as requested to facilitate or complete delivery or to make available and provide ongoing support, maintenance, repair, training, or other Services related to the Services being purchased by customers), and (c) any data you provide in connection with your account with us (if one exists for purposes of accessing our Services), such as *account log-in credentials* (collectively, “**non-Personal Data**”). When we combine non-Personal Data with Personal Data, we may treat the combined information as Personal Data.

You can always refuse to provide your Personal Data, but please note that some Personal Data is necessary to provide our Services.

## 2. HOW WE COLLECT PERSONAL DATA

We need to collect Personal Data from or about you in order to provide you with our Services, as well as to improve your experience. You may provide us with Personal Data, directly and indirectly, in several ways, including, for example, when you:

- Use or interact with our Services, including using certain Services when operating a vehicle;
- Register or create an account with us;
- Sign up to receive our newsletter or promotional information;
- Ask for customer service, support or other assistance; or
- Correspond or interact with us in any other way, online or offline, including through our Services.

## Cookies

We also use “cookies,” which are small data files placed on your computer, mobile device, or other equipment when you visit certain online pages, such as our web platform, that record certain actions you take upon accessing our platform. The platform uses strictly necessary cookies, which are essential to the proper functioning of the platform and the related Services made available through it. For example, these cookies allow us to authenticate users and enable them to gain access to requested content, features, or other Services via our web platform. If you remove or disable these cookies, we cannot guarantee that you will be able to access or otherwise use our web platform or other Services.

## Offline Interactions and Other Sources

We also may collect Personal Data from other sources, such as our customers (e.g., golf courses and the golf cart labels they create) and third-party service providers (e.g., third-party integrations that you connect with, access, and/or use in connection with your interactions with our Services), or from our offline interactions with you for the purposes listed in the **How We Use Personal Data** section below, including to enable us to verify or update information contained in our records and to better customize the Services for you.

### **3. HOW WE USE PERSONAL DATA**

We collect your Personal Data (including limited Sensitive Personal Data – e.g., precise geolocation – in certain instances) to support our business operations, including for the following purposes:

- to ensure effective development, administration, and management of Pace's relationship with its customers (e.g., golf courses), third-party service providers (e.g., third-party integrators), and individual end-users (e.g., golfers, caddies, and other individuals within the golfer's party, etc.);
- to make our Services available to customers and other Pace users;
- to build member profiles about golfers or other Pace users that show the evolution of a golfer member at a golf club over time, and personalize Services to (and experiences for) those golfers or other Pace users through such profiles that include individualized content;
- to fulfill Pace's contractual support and warranty obligations with golf course customers to ensure Pace's Services operate effectively;
- to provide golf course customers with information regarding golfers' or other Pace users' pace of play, payment status for each round of golf, driving behavior (including any violations of geofences, such as driving on the green or in other restricted areas), and food and beverage orders to enable such customers to enhance metrics, improve pace of play, manage score cards for tournaments, and perform other golf course related functions;
- to enhance Pace's lead generation/management and digital marketing efforts;
- to understand how you use our Services and identify any issues in how the Services are used and how we can improve your experience with our Services;
- to better understand and address the preferences of our customers and individual end-users of our Services;
- to infer characteristics about golfers and other Pace users, which may be used to further personalize Services provided to such golfers and other Pace users;
- to provide customer service, as well as to facilitate your interactions and transactions with us, such as requests for support or additional Services, as well as to respond to your requests, communications, suggestions, inquiries, and comments (including your feedback about our Services);
- to provide you with information, products, or Services that you request from us;
- to provide you with, and improve, relevant marketing offers or information from us;
- for testing, research, analysis and product development (e.g., new products, features, and Services);
- to manage Pace's fleet of devices and vehicles equipped with Pace devices utilized and deployed by customers;
- to analyze product performance, maintenance, and operations of Pace's products and Services;
- to maintain, support, troubleshoot, manage and improve our Services;
- to ensure our premises are secure, and to help maintain the safety, security, and integrity of our Services, products, databases and other technological assets, and business;
- to prevent, detect, or investigate unauthorized use of our Services, and to protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity;
- to assist in the event of an emergency, and to manage any dispute and accidents and take legal or other professional advice;
- to exercise or defend legal claims, and to respond to legally binding requests from law enforcement, regulatory authorities, or other third parties;
- to carry out our legal and contractual obligations, and to enforce our rights arising from any contracts entered into between you and us (including, but not limited to, any applicable terms of use or service);
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about you is among the assets transferred;
- to comply with our legal, regulatory, and contractual obligations;
- to fulfill any other purpose for which you provide it;

- for any other purpose with your consent; and
- in any other way we may describe when you provide the information or as otherwise permitted by applicable law.

We may also combine your Personal Data collected through various sources, including information collected through our Services, and develop profiles of Pace users that will be used for the purposes above.

We may use Personal Data to create non-Personal Data, and we may use non-Personal Data for any legitimate business purpose.

#### **4. HOW WE DISCLOSE PERSONAL DATA**

We only disclose Personal Data in limited circumstances as described in this Privacy Notice. For example, we may disclose Personal Data to our corporate affiliates and subsidiaries as well as our third-party service providers, suppliers, vendors, professional advisors, and/or customers (e.g., golf courses). However, we do not disclose Personal Data to third parties for their own direct marketing purposes without your consent. We also contract with these third parties to ensure that they only process your Personal Data under our instructions and ensure the security and confidentiality of your Personal Data. We disclose Personal Data with these third parties to help us:

- with the uses described in the **How We Use Information** section above;
- in the operation, management, improvement, research and analysis of our Services;
- comply with your directions or any consent you have provided us; and
- otherwise fulfill the purpose for which you provide it.

We may disclose Personal Data with law enforcement and regulatory authorities or other third parties as required or permitted by law for the purpose of:

- responding to a subpoena, court order, or other legal processes;
- complying with applicable laws and contractual obligations;
- exercising or defending legal claims;
- defending, protecting, or enforcing our rights;
- protecting the property or safety of Pace, its customers, users, or others; and/or
- assisting in the event of an emergency.

In accordance with applicable law, we may also transfer or assign Personal Data to third parties as a result of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation. If we are involved in defending a legal claim, we may disclose Personal Data about you that is relevant to the claim to third parties as a result of, or in connection with, the associated legal proceedings.

We disclose non-Personal Data with third parties as reasonably necessary to meet our business needs.

#### **Information You Share or Post Online Including Related to Our Services**

Please be aware that there are public areas that interact with our Services, such as our social media channels, where individuals may voluntarily disclose Personal Data. This information may be seen and used by others. We encourage everyone to exercise good judgement when using these public areas and sharing Personal Data.

#### **5. HOW WE PROTECT PERSONAL DATA**

We are dedicated to ensuring the security of your Personal Data. We use physical, electronic, and administrative security measures appropriate to the risks and sensitivity of the Personal Data we collect. Personal Data is maintained on our servers or those of our service providers, and is accessible by authorized employees, representatives, and agents as necessary for the purposes described in this Privacy Notice. We aim to provide secure transmission of your Personal Data from your devices or use of our Services to our servers. We have processes to store Personal Data that we have collected in secure operating environments. Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Data to you. While we attempt to protect your Personal Data in our possession, no method of transmission over the internet or security system is perfect, and we cannot promise that information about you will remain secure in all circumstances.

#### **6. THIRD PARTY WEBSITES AND APPLICATIONS**

Our Services may contain links to other websites or applications operated by third parties. Please be advised that the practices described in this Privacy Notice do not apply to information gathered through these third-party websites and applications. We have no control over, and are not responsible for, the actions and privacy policies of third parties and their respective websites and applications.

#### **7. DATA TRANSFERS**

In order to provide our Services to you, we may store and process your Personal Data outside of the country where you reside or are located, including to countries that may not or do not provide an equivalent level of protection for your Personal Data. In addition, the information collected by us or on our behalf may be transferred to, stored, and processed in any country or territory where one or more of our customers (e.g., golf courses) or service providers are based or have facilities which may be in a jurisdiction different from the country where you reside or are located. While other countries or territories may not have the same

standards of data protection as those in your home country, we will continue to protect Personal Data that we transfer in line with the applicable privacy regulations in the jurisdiction where you reside or are otherwise located. By using our Services, you represent that you have read and understood the above and hereby consent to the transfer, storage, and/or processing of your Personal Data outside the country where you reside or are located, including in the United States.

## 8. CHILDREN'S PRIVACY

Our Services are not intended for children or those under the age of 18. We do not knowingly collect Personal Data from children or other persons who are under 18 years of age. Individuals who are children or those under the age of 18 should not attempt to provide us with any Personal Data. If you think we have received Personal Data from children or those under the age of 18, please [contact us](#) immediately.

## 9. DO NOT TRACK

Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they "do not track" your online activities. However, there is no accepted standard for how a website or online service should respond to this signal and, at this time, our Services do not currently change the way they operate upon detection of a Do Not Track signal.

## 10. DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfill the purposes for which we collected it and in accordance with our legal obligations or as otherwise permitted or required by law. For example, if you are a member of a golf course that deploys Pace Services which you use, we will retain your Personal Data associated with your member profile that we have built for as long as you are an active Pace user at the course where you are a member or until you request us to delete your Personal Data (subject to the below and the **Your Choices and Controls** section of our Privacy Notice). In addition, we may have a legal obligation to retain Personal Data relating to a purchase you made with us or in connection with your use of our Services. We will delete your data once the legal obligation expires. Similarly, we may need to retain Personal Data in order to exercise our legal rights or defend legal claims involving you (or the company at which you work if it is one of our customers). We will delete this information once it is no longer needed for such purposes. We may also retain some or all of your Personal Data when your information is subject to one of the following exceptions:

- When stored in our backup and disaster recovery systems. Your Personal Data will be deleted when the backup media your Personal Data is stored on expires or when our disaster recovery systems are updated.
- When necessary to help ensure the security and integrity of our Services and IT systems. Your Personal Data will be deleted when we no longer require it for such purposes.

## 11. YOUR CHOICES AND CONTROLS

### Email Communications / Direct Marketing

You may have the opportunity to receive certain communications from us related to our Services. If you provide us with your email address in order to receive communications, you can opt-out of marketing emails at any time by following the instructions at the bottom of our emails and adjusting your email preferences. Please note that certain emails may be necessary for the operation of our Services. You will continue to receive these necessary emails, if lawful and appropriate, even if you unsubscribe from our optional marketing communications.

### Other Rights

In accordance with applicable law, you may exercise certain choices and rights in connection with our Services as described in this section, as we'll as in any applicable jurisdiction-specific appendix attached to this Privacy Notice. Some of the rights may vary depending on your country, province, or state of residence.

Please note that many of these rights are not absolute, and we may have grounds for refusing to comply with your request to exercise them. Where such circumstances apply, we will inform you of this at the time you make a request to exercise your rights.

- **Accessing Your Personal Data (Right to Know).** You have the right to request access to the Personal Data that we collect, use, and disclose about you. You also have the right to not receive discriminatory treatment for exercising your access right. To submit a request or designate an authorized agent to make a request on your behalf, please contact us using the information below.
- **Accessing Specific Pieces of Your Personal Data (Data Portability).** You have the right to request that we provide you with a copy of the specific pieces of Personal Data that we have collected about you, including any Personal Data that we have created or otherwise received from a third-party about you. If you make such a request electronically, we will provide you with a copy of your Personal Data in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Data to another third-party. If we are unable to disclose certain pieces of your Personal Data, we will describe generally the types of Personal Data that we were unable to disclose and provide you with a description of the reason we are unable to disclose it. To submit a request or designate an authorized agent to make a request on your behalf, please [contact us](#) using the information below.

- **Deleting Your Personal Data.** You have the right to request that we delete your Personal Data, subject to some exceptions under applicable law. Once we have received and confirmed your request, we will delete (and direct our partners and service providers to delete) your Personal Data, unless an exception under applicable law applies. You have the right to not receive discriminatory treatment for exercising your deletion right. To submit a request or designate an authorized agent to make a request on your behalf, please contact us using the information below.
- **Correcting Your Personal Data.** You have the right to request that we update or correct the Personal Data we collect. You also have the right to not receive discriminatory treatment for exercising your correction right. To submit a request or designate an authorized agent to make a request on your behalf, please contact us using the information below.

#### Jurisdiction-Specific Rights & Disclosures

The law in certain jurisdictions may provide you with additional disclosures and/or rights regarding our collection, use, and other processing of your Personal Data. To learn more about information relevant to our processing of your Personal Data and any additional rights that may be applicable to you as a resident of one of these jurisdictions, please refer to the jurisdiction-specific sections or appendices herein that are referenced below.

- **For Residents of California:** Please refer to our [California Privacy Appendix](#).
- **For Residents of the European Economic Area (“EEA”) or United Kingdom (“UK”):** Please refer to our [European Privacy Law Appendix](#).

## 12. CONTACT US

We welcome requests, questions, comments, and feedback on this Privacy Notice and our management of Personal Data. If you have requests, questions, concerns, or feedback, you can always contact us in the following ways. For your protection, we may need to verify your identity before assisting with your request, such as verifying that the information used to contact us matches the information that we have on file.

<b>Email</b>	<a href="mailto:tsvdataprivacy@textron.com">tsvdataprivacy@textron.com</a>
<b>Mailing Address</b>	1451 Marvin Griffin Rd. Augusta, GA 30906

#### Submitting a Privacy Request

You can submit a request as described in the **Your Choices and Controls** section by:

- Submitting a [Request Form](#);
- Calling 888-706-4849; or
- Emailing [tsvdataprivacy@textron.com](mailto:tsvdataprivacy@textron.com).

#### Verification Process and Required Information

Some of the requests under **Your Choices and Controls** must be verified to confirm the request came from you. We may contact you by phone or e-mail to verify your request. This process may require us to request additional Personal Data from you, including, but not limited to, your email address, mailing address, account name, and/or date of last interaction with us. In certain circumstances, we may decline a request to exercise a privacy right, particularly where we are unable to verify your identity.

#### Responding to Requests

Once you have submitted your request, we will respond within the time frame permitted by the applicable law. We may charge a reasonable fee for multiple requests in the same 12-month period, as permitted by law.

#### Authorized Agent

You may designate an authorized agent to submit a request on your behalf, in which case we may require such an agent to provide proof that you gave that agent signed permission to submit the request. We may also require you to do either or both of the following: (i) verify your own identity directly with us; and/or (ii) directly confirm with us that you provided the authorized agent with permission to submit the request. We may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

## California Privacy Law Appendix

This Appendix for California Residents (the “**California Privacy Appendix**” or “**Appendix**”) supplements the information contained in our Notice at Collection and Privacy Notice and applies solely to all visitors, users, and other individuals who reside in the State of California (“**consumers**,” “**you**,” or “**your**”). We adopt this Appendix to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “**CPRA**”) and any terms defined in the CPRA have the same meaning when used in this Appendix.

This Appendix applies to Personal Data we collect in various contexts (including, but not limited to, the business-to-business setting), both online and offline (as defined and more fully described in our Privacy Notice), that identifies, relates to, describes,

references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. However, publicly available information that we collect from government records and deidentified or aggregated information (within the meaning of CPRA) are not considered Personal Data and fall outside the scope of this Appendix.

To learn more about the categories of Personal Data we collect (and have collected over the prior 12 months), how we collect this information, why we collect it, to whom we have disclosed it (over the prior 12 months) and for what business purpose(s), whether we sell or share it, and one additional right you have with respect to your Sensitive Personal Data, please see the table below. In addition, we retain your Personal Data in the same manner described in the **Data Retention** section of our Privacy Notice.

Category	What We Collect	How We Collect It	Why We Collect It	To Whom Do We Disclose It & For What Purpose(s)	Whether it is Sold or Shared
<b>Identifiers</b>	Real name, postal address, email address, phone number, unique personal identifiers (e.g., GHIN number), business contact details (e.g., company name, email address and/or phone number, job title, etc.), IP address, participation details (e.g., information about the courses you play at, dates and times of play, which hole you are at throughout the round, and your scores) and other similar identifiers.	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties or customers via golf cart labels created by the golf course.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our affiliates, customers, vendors, and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Personal information categories described in the California Customer Records statute</b>	Name, postal address, phone number, and job title.	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our affiliates, customers, vendors, and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Protected classification characteristics under California or federal law</b>	Gender.	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our vendors, customers, and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Commercial information</b>	Transactional information relating to the products or Services purchased and other information necessary to facilitate or complete delivery or to make available and provide ongoing support, maintenance, repair, training, or other Services related to the	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our affiliates, customers, vendors, and service providers, as described in the <b>How We Disclose Personal Data</b> section above, for the business purposes listed below.	No



Category	What We Collect	How We Collect It	Why We Collect It	To Whom Do We Disclose It & For What Purpose(s)	Whether it is Sold or Shared
	Services being purchased.				
<b>Internet or other electronic network activity information</b>	<p>Information regarding your interaction with or use of our Services. This includes, but is not limited to, information collected or created in connection with the use of a Pace device or vehicle with such a device that is equipped with a telematics-based system developed by Pace to support users with information on the Pace device, vehicle, driver, and fleet performances, positioning, tracking, messaging and integration of third-party applications.</p> <p>This also includes data you provide from your use of Pace's Services, including information about food and beverage orders, music pairing, and the two-way messaging system, as well as maintenance-related data, and numerous signals from the Pace product or Service about its performance.</p>	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our affiliates, customers, vendors, and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Geolocation data</b>	<p>IP-based general location data, which may be used to locate the city and state that you are in when you access our Services.</p> <p>We also collect precise geolocation data, which may be used to determine your or others' (e.g., caddies') physical location or movements, such as on a golf course, in real-time, through your or their use of a Pace device (whether it is on someone's person, affixed to equipment or otherwise), operation of a vehicle equipped with</p>	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties (e.g., generated from a golf course customer's network or router IP address that is connected to our Services).	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our customers, vendors and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No

Category	What We Collect	How We Collect It	Why We Collect It	To Whom Do We Disclose It & For What Purpose(s)	Whether it is Sold or Shared
	such a device (e.g., golf cart), or other interactions with our Services.				
<b>Audio, visual, electronic, or similar information</b>	Photo(s) of you (in connection with tee sheets)	Collected indirectly from third parties (e.g., third-party integrations)	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our customers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Inferences</b>	Inferences drawn from any of the collected Personal Data listed above to create a profile about, for example, your preferences, characteristics, and predispositions.	Collected automatically as Pace users (e.g., golfers, caddies, and others in the golfer's party) navigate, use, or otherwise interact with Pace's products or Services.	We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.	Our customers, as described in the <b>How We Disclose Personal Data</b> section above, and for the related business purposes listed below.	No
<b>Sensitive Personal Data</b>	Precise geolocation data, which may be used to determine your or your caddie's physical location or movements in real-time, such as on a golf course, through your or their (i) use of a Pace device (whether it is on their person or affixed to their equipment or otherwise), (ii) operation of a vehicle equipped with such a device (e.g., a golf cart), or (iii) other interactions with our Services.	Collected when you directly provide it to us, through your use of our Services, or indirectly from third parties.	<p>We collect this information for the purposes listed in the <b>How We Use Personal Data</b> section above.</p> <p>We may also use your precise geolocation data:</p> <ul style="list-style-type: none"> <li>• for the purpose of inferring characteristics about you, which may be used to further personalize our Services to you and others, market and improve our Services and other products, and help us target specific items of interest to you; &amp;</li> <li>• to create a profile about you and possibly others (such as those with whom you are playing golf, including caddies) based on your or their use of a Pace device (whether it is on someone's person, affixed to their equipment, or otherwise) and operation of a vehicle equipped with such a device (e.g., golf cart), as well as how you or they use or interact with us and our Services.</li> </ul>	Our customers, vendors and service providers, as described in the <b>How We Disclose Personal Data</b> section above, and for the business purposes listed below.	No

Category	What We Collect	How We Collect It	Why We Collect It	To Whom Do We Disclose It & For What Purpose(s)	Whether it is Sold or Shared
	Account log-in credentials (if an account exists).	Collected online when you directly provide it to us or through your use of our Services.	We collect this information to provide you access to use our Services.	We do not disclose this information.	No

We disclose your Personal Data to the categories of third parties listed above for the following business purposes:

- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer or member information, providing analytic services, or providing storage or similar services on our behalf.
- Undertaking activities to verify or maintain the quality or safety of our Services (e.g., Pace devices) that are owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance such Services that are owned, manufactured, manufactured for, or controlled by us.

**HOWEVER, WE DO NOT: (A) “SELL” ANY PERSONAL DATA FOR EITHER MONETARY OR OTHER VALUABLE CONSIDERATION AND HAVE NO ACTUAL KNOWLEDGE OF “SELLING” ANY PERSONAL DATA OF CONSUMERS UNDER THE AGE OF 16 FOR MONETARY OR OTHER VALUABLE CONSIDERATION; OR (B) “SHARE” ANY PERSONAL DATA WITH THIRD PARTIES FOR CROSS-CONTEXT BEHAVIORAL ADVERTISING PURPOSES AND HAVE NO ACTUAL KNOWLEDGE OF “SHARING” ANY PERSONAL DATA OF CONSUMERS UNDER THE AGE OF 16 FOR SUCH PURPOSE.**

#### **Limiting the Use and Disclosure of Your Sensitive Personal Data.**

In addition to the rights afforded to you under the **Your Choices and Controls** section of our Privacy Notice, you also have the right to limit the use and disclosure of your Sensitive Personal Data we collect for certain purposes permitted by law, unless an exception applies. You also have the right to not receive discriminatory treatment for exercising your limitation right. To exercise this right or designate an authorized agent to exercise this right on your behalf, please submit a “Request to Limit” using our [Request Form](#) or contact us using the other information above. You or your authorized agent may also submit a request to us by visiting the following link: [Limit the Use of My Sensitive Personal Data](#).

# EUROPEAN PRIVACY LAW APPENDIX

This Appendix for European Residents (the “**European Privacy Law Appendix**” or “**Appendix**”) is supplemental and provides disclosures in addition to those made elsewhere in our Privacy Notice. This Appendix only applies if you are a resident of the United Kingdom (“**UK**”) or a member state of the European Union (“**EU**”) or European Economic Area (“**EEA**”) and provide your Personal Data to us, directly or indirectly, in connection with your interactions with us, use of our Services, or otherwise.

We adopt this Appendix to comply with the European Union’s General Data Protection Regulation, and any laws implementing the foregoing by any member states of the European Economic Area and/or the United Kingdom (including the UK Data Protection Act and the UK-GDPR) (which may be collectively referred to herein as the “**GDPR**”). Unless otherwise defined in this European Privacy Law Appendix, any terms defined in the GDPR or our Privacy Notice have the same meaning when used in this Appendix. When this European Privacy Law Appendix is applicable to you, it takes precedence over anything contradictory in our Privacy Notice.

## 1. **Data Controller and Representatives**

Textron Specialized Vehicles Inc. (d/b/a Pace Technologies, LLC) (collectively, “**Pace**”, “**us**”, “**our**”, or “**we**”) is the data controller for the processing of Personal Data it collects about you as further described in the Privacy Notice above. Pace has appointed a Data Protection Officer (“**DPO**”) and a representative in both the European Union and the United Kingdom in compliance with the GDPR. Pace, its DPO, and its representatives may be contacted in any manner set forth below in the **Contact Information** section of this Appendix.

## 2. **Information We Collect and Process**

To learn more about the Personal Data we collect and process – including the purposes for which Personal Data is processed by or on behalf of Pace, the legal basis (or bases) for doing so, the source(s) from which the Personal Data originates, the subject of the Personal Data processed, and the categories of recipients of such Personal Data, please see the table below.

Please note that, for certain purposes listed below, Pace processes the same categories of Personal Data collected from or about individual end-users of Pace’s Services and representatives of Pace’s B2B Customers (Current & Prospective). In these instances, Personal Data that is associated with an individual end-user is denoted by an asterisk (\*), and Personal Data pertaining to representatives of Pace’s B2B customers is denoted by a caret (^).

<b><u>Purposes of Processing</u></b>	<b><u>Legal Basis for Processing</u></b>	<b><u>Subject(s) of the Personal Data Processed</u></b>	<b><u>Categories of Personal Data and Specific Data Elements Processed</u></b>	<b><u>Source of the Personal Data</u></b>	<b><u>Categories of Recipients</u></b>
<ul style="list-style-type: none"> <li>• To ensure effective administration and management of our relationship with customers.</li> <li>• To make our systems, devices, products and other Services available to customers to deploy and/or utilize on their golf courses.</li> <li>• To manage our fleet of devices and vehicles equipped with Pace devices used by customers.</li> <li>• To fulfill our contractual support and warranty obligations with golf course customers to ensure Pace’s Services operate effectively.</li> <li>• To provide customer service.</li> </ul>	<i>Contractual necessity</i>	<b>Representatives of Pace’s B2B Customers (Current and Prospective)</b>	<b>Identifiers and Contact Information – i.e., name, business contact details (e.g., job title and company name, email address and phone number), and account log-in credentials (if an account exists)</b>	<i>Directly from Pace’s B2B Customers (current and prospective)</i>	<ul style="list-style-type: none"> <li>• Corporate affiliates</li> </ul>

<b><u>Purposes of Processing</u></b>	<b><u>Legal Basis for Processing</u></b>	<b><u>Subject(s) of the Personal Data Processed</u></b>	<b><u>Categories of Personal Data and Specific Data Elements Processed</u></b>	<b><u>Source of the Personal Data</u></b>	<b><u>Categories of Recipients</u></b>
<ul style="list-style-type: none"> <li>To enhance our lead generation / management and digital marketing efforts.</li> </ul>	<i>Legitimate interests</i> in direct marketing	<b>Representatives of Pace's B2B Customers (Current and Prospective)</b>	<b>Identifiers and Contact Information</b> – i.e., name and business contact details	<i>Indirectly</i> via third-party plug-in provider(s)	<ul style="list-style-type: none"> <li>Corporate affiliates</li> </ul>
<ul style="list-style-type: none"> <li>To make Pace's products and Services (along with third-party integrations, where applicable) available to golfers and other users of our Services.</li> <li>To build member profiles about golfers or other Pace users (e.g., golfers, caddies, and others in the golfer's party, etc.) that show the evolution of a golf member at a golf club over time, and personalize Services to those golfers or Pace users through such profiles that include individualized content to enhance user experience and functionality.</li> <li>To provide golf course customers with information regarding golfers' or other Pace users' pace of play, payment status for each round of golf, driving behavior (including any violations of geofences, such as driving on the green or in other restricted areas), and food and beverage orders to enable such customers to enhance metrics, improve pace of play, manage score cards for tournaments, and perform other golf course related functions.</li> <li>For testing, research, analysis, and product development.</li> </ul>	<i>Legitimate interests</i> in: <ul style="list-style-type: none"> <li>- Developing, administering, and managing our business &amp; relationships with Pace users and third-party integrations that Pace users connect with and/or use when they interact with our Services.</li> <li>- Understanding how golfers and other Pace users use our Services, and identify any issues in how the Services are used and how Pace can improve user experience &amp; functionality.</li> <li>- Identifying, tracking, and resolving inquiries or issues with Pace's Services, including Pace devices and Pace-equipped vehicles.</li> </ul>	<b>Individual End Users</b> (e.g., golfers, caddies, and other people in the golfer's party using a Pace device, operating a Pace-equipped vehicle, or otherwise interacting with our Services)	<b>Identifiers and Contact Information</b> – i.e., name, email address, company name, job title	<i>Directly</i> from you when you provide it to us (e.g., by contacting customer service)	<ul style="list-style-type: none"> <li>Corporate affiliates</li> <li>Golf Courses (Pace's Customers)</li> </ul>
			<b>Identifiers and Contact Information</b> – i.e., name, member number.	<i>Indirectly</i> via golf cart labels created by the golf course	<ul style="list-style-type: none"> <li>Golf courses (Pace's Customers)</li> <li>Third-party integrations</li> </ul>
			<b>Participation Details</b> – i.e., information about the courses you play at, dates and times of play, which hole you are at throughout the round, and your scores and handicap (e.g., GHIN number)		<ul style="list-style-type: none"> <li>Golf courses (Pace's Customers)</li> <li>Third-party integrations</li> </ul>
			<b>Demographic Information</b> – i.e., gender	<i>Indirectly</i> via third-party integrations	<ul style="list-style-type: none"> <li>Golf Courses (Pace's Customers)</li> </ul>
			<b>Identifiers and Contact Information</b> – e.g., name, member number, and photo of you (in connection with tee sheets)		<ul style="list-style-type: none"> <li>Golf Courses (Pace's Customers)</li> </ul>
			<b>Participation Details</b> – i.e., GHIN number		<ul style="list-style-type: none"> <li>Golf courses (Pace's Customers)</li> <li>Third-party integrations</li> </ul>
			<b>Identifiers and Contact Information</b> – i.e., IP address	<i>Indirectly</i> from routers and networks (including cellular, Wi-Fi, and those hosted by golf courses) connected to our Services	<ul style="list-style-type: none"> <li>We do not disclose this information</li> </ul>

<u>Purposes of Processing</u>	<u>Legal Basis for Processing</u>	<u>Subject(s) of the Personal Data Processed</u>	<u>Categories of Personal Data and Specific Data Elements Processed</u>	<u>Source of the Personal Data</u>	<u>Categories of Recipients</u>
<ul style="list-style-type: none"> <li>To analyze product performance, maintenance, and operations of Pace's products and Services.</li> <li>To provide customer service and troubleshooting support to Pace users.</li> <li>To infer characteristics about golfers and other Pace users, which may be used to further personalize Services provided to such golfers or other Pace users.</li> </ul>			<b>Geolocation Data</b> – <i>i.e.</i> : (i) IP-based general location data, which may be used to locate the city and state that you are in when you access our Services; and (ii) precise geolocation data ( <i>e.g.</i> , physical location or movements in real-time, such as on a golf course, through your use of or interaction with our Services)	<i>Automatically</i> as you navigate, use or otherwise interact with our Services	<ul style="list-style-type: none"> <li>Golf Courses (Pace's Customers)</li> <li>Third-party integrations</li> </ul>
			<b>Usage Information</b> – <i>i.e.</i> , obtained via: (i) food and beverage orders; (ii) music pairing; and (iii) the two-way messaging system, as well as maintenance-related data, and numerous signals from the Pace product or Service about its performance		<ul style="list-style-type: none"> <li>Golf Courses (Pace's Customers)</li> </ul>
			<b>Inferences</b> – <i>e.g.</i> , pace of play, golf aptitude, cart driving behavior, and preferences ( <i>e.g.</i> , favorite food / beverages consumed on course)		<ul style="list-style-type: none"> <li>Golf Courses (Pace's Customers)</li> </ul>
<ul style="list-style-type: none"> <li>To help maintain the safety, security, and integrity of our products and Services, databases and other technological assets, and business, including detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.</li> </ul>	<i>Compliance with a legal obligation</i>  <i>Legitimate interests in:</i> <ul style="list-style-type: none"> <li>Ensuring the security of our data, systems, and Services to a standard that goes beyond our legal obligations.</li> <li>Preventing and detecting unlawful or unauthorized activity that could be damaging for you and/or us.</li> </ul>	<ul style="list-style-type: none"> <li><b>Representatives of Pace's B2B Customers (Current and Prospective) (^)</b></li> <li><b>Individual End Users (*)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Identifiers and Contact Information<sup>^</sup></b></li> <li><b>Usage Information<sup>*</sup></b></li> <li><b>Geolocation Data<sup>*</sup></b></li> </ul>	<i>Automatically</i> as you navigate, use, or otherwise interact with Pace's Services	<ul style="list-style-type: none"> <li>Corporate affiliates</li> <li>Professional advisors</li> <li>Law enforcement, government, judicial, and/or regulatory authorities</li> </ul>

<b><u>Purposes of Processing</u></b>	<b><u>Legal Basis for Processing</u></b>	<b><u>Subject(s) of the Personal Data Processed</u></b>	<b><u>Categories of Personal Data and Specific Data Elements Processed</u></b>	<b><u>Source of the Personal Data</u></b>	<b><u>Categories of Recipients</u></b>
<ul style="list-style-type: none"> <li>To evaluate or conduct a significant corporate transaction or restructuring, including a merger, acquisition, dissolution or other sale or transfer of some or all of Pace's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us is among the assets transferred.</li> </ul>	<p><i>Compliance with a legal obligation</i></p> <p><i>Legitimate interest of Pace (or of a third party) to protect, realize, and grow the value in our business and assets</i></p>	<ul style="list-style-type: none"> <li><b>Representatives of Pace's B2B Customers (Current and Prospective) (^)</b></li> <li><b>Individual End Users (*)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Identifiers and Contact Information*^</b></li> <li><b>Demographic Information*</b></li> <li><b>Usage Information*</b></li> <li><b>Geolocation Data*</b></li> <li><b>Participation Details*</b></li> <li><b>Inferences*</b></li> <li><b>Purchase Information^</b></li> </ul>	<p><i>Directly</i> from you when you submit it to us</p> <p><i>Automatically</i> as you navigate, use, or otherwise interact with Pace's Services</p> <p><i>Indirectly</i> via third-party integrations, golf courses, and golf cart labels created by the golf course</p>	<ul style="list-style-type: none"> <li>Corporate affiliates</li> <li>Professional advisors, potential acquirer(s), and/or other related parties involved in such a transaction</li> </ul>
<ul style="list-style-type: none"> <li>To carry out our legal and contractual obligations;</li> <li>To enforce our rights arising from any contracts entered into between you and us;</li> <li>To exercise or defend legal claims;</li> <li>To respond to legally binding requests from law enforcement, regulators, or other third parties or as otherwise may be required by applicable law, court order, or governmental regulations; and</li> <li>For litigation case management and evidentiary purposes.</li> </ul>	<p><i>Compliance with a legal obligation</i></p> <p><i>Legitimate interest in managing legal proceedings and defending Pace against any possible civil claims or regulatory enforcement action</i></p> <p><i>[*Note: We may process some or all of the Personal Data listed in the third column of this row if it is necessary to comply with a valid request from a regulator or other official body of authority, or where it is relevant to any ongoing / prospective legal proceedings.]</i></p>	<ul style="list-style-type: none"> <li><b>Representatives of Pace's B2B Customers (Current and Prospective) (^)</b></li> <li><b>Individual End Users (*)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Identifiers and Contact Information</b></li> <li><b>Demographic*^</b></li> <li><b>Usage Information*</b></li> <li><b>Geolocation Data*</b></li> <li><b>Participation Details*</b></li> <li><b>Inferences*</b></li> <li><b>Purchase Information^</b></li> </ul>	<p><i>Directly</i> from you when you submit it to us</p> <p><i>Automatically</i> as you navigate, use, or otherwise interact with Pace's Services</p> <p><i>Indirectly</i> via third-party integrations, golf courses, and golf cart labels created by the golf course</p>	<ul style="list-style-type: none"> <li>Law enforcement, government, judicial, and/or regulatory authorities</li> <li>Professional advisors</li> </ul>

### 3. **Lawful Basis for Processing**

The processing of your Personal Data is lawful only if it is permitted under the GDPR. As noted above, we have a lawful basis for each of our processing activities (except when an exception applies as described below):

- To Fulfill Our Obligations to You Under our Contract.** We process your Personal Data as necessary to perform our responsibilities under our contract with you – for example, to process your order and deliver the product(s) or Services you purchased from us.

- **Compliance with Legal Obligations.** To meet our regulatory and legal obligations, we may need to process some of your Personal Data.
- **Legitimate Interests.** We will process your Personal Data as necessary for our legitimate interests. Our legitimate interests are balanced against your interests and rights and freedoms and we do not process your Personal Data if your interests or rights and freedoms outweigh our legitimate interests. We process your Personal Data only as far as it is necessary to achieve the purpose outlined in our Privacy Notice. Our processing activities will not unreasonably intrude on your privacy and ultimately benefits you in optimizing our provision of the Services and its features to you. Specifically, we rely upon several legitimate interests in processing your Personal Data, as set forth in the table above in Section 2.

#### 4. **Automated Decision Making**

We do not use your Personal Data with any automated decision-making process, including profiling, which may produce a legal effect concerning you or similarly significantly affect you.

#### 5. **International Transfers**

In order to provide our Services to you, we may send, store, or otherwise process your Personal Data outside of the EEA or the UK, including in or to the United States. Accordingly, your Personal Data may be transferred, stored, or otherwise processed outside the country where you reside or are located, including countries that may not or do not provide an equivalent level of protection for your Personal Data. In limited circumstances, federal, state, and local governments, courts, or law enforcement or regulatory agencies in the United States may be able to obtain disclosure of your information through the laws of the United States. By using our Services, you represent that you have read and understood the above and hereby consent to the storage and processing of Personal Data outside the country where you reside or are located, including in the United States.

In addition, the Personal Data we store or otherwise process about you may be transferred to and stored by our corporate affiliates and other service providers (as specified in the **How We Disclose Personal Data** section of our Privacy Notice, above) who operate on our behalf.

In certain cases, there may not be an adequacy decision by the European Commission and/or United Kingdom authorities in respect of those countries. Adequacy of data protection is instead ensured by Standard Contractual Clauses approved by the European Commission in accordance with Article 46(2)(c) of the GDPR, or any equivalent clauses approved by the authorities in the United Kingdom including any additional safeguards as required by EU / UK data protection laws that we have in place with that third party. A copy may be requested by [contacting us](#).

#### 6. **Data Retention**

We retain your Personal Data in the same manner described in the **Data Retention** section of our Privacy Notice. In general, where we are processing Personal Data based on:

- *our legitimate interests*, we generally will retain the data for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects;
- *contractual necessity*, we generally will retain the information for the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from the contractual relationship; or
- *a legal obligation*, we generally will retain the information for the period of time necessary to fulfill the legal obligation.

#### 7. **Your Privacy Rights**

You may have – in accordance with the GDPR – the following rights when it comes to our handling of your Personal Data. Please note that many of these rights are not absolute, and we may have grounds for refusing to comply with your request to exercise them (for example, where we are (i) required or permitted by law to process your Personal Data in a way that is incompatible with your request, or (ii) able to rely on exemptions under data protection law which entitle us to process your Personal Data in a way that is incompatible with your request). Where such circumstances apply, we will inform you of this at the time you make a request to exercise your rights.

- **Right of access** – you may have the right to request a copy of the Personal Data we have about you and to request supporting information explaining how the Personal Data is used.
- **Right of rectification** – you may have the right to request that we rectify inaccurate Personal Data about you.
- **Right of erasure** – you may have the right to request that we erase Personal Data about you.
- **Right to restrict processing** – in some situations, you may have the right to request that we do not use the Personal Data you have provided (for example, if you believe it to be inaccurate).
- **Right to data portability** – you may have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and to transmit such Personal Data to another controller, when technically feasible.



- **Right to withdraw consent** – where we process your Personal Data based on consent (including for direct marketing), you have the right to withdraw consent at any time. However, this will not affect the lawfulness of the processing based on consent before its withdrawal. Furthermore, even in case of a withdrawal we may continue to process your Personal Data as permitted or required by law.
- **Right to object** – where we are processing your Personal Data based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your Personal Data where we can demonstrate that we have compelling legitimate grounds to process your information (which overrides your rights and freedoms), or if continuing to process your Personal Data is relevant to the establishment, exercise or defense of legal claims. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Right to lodge a complaint** – You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Alternatively, you can also make a complaint to the supervisory authority in the Member State of the EU or EEA in which you are resident. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or a supervisory authority, so please contact us in the first instance.

If you would like to exercise any of these rights or in case you should have any questions or concerns about how we process your Personal Data, you may contact us via email at [tsvdataprivacy@textron.com](mailto:tsvdataprivacy@textron.com) or by mail to 1451 Marvin Griffin Rd. Augusta, GA 30906.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data, or access someone else's Personal Data on their behalf (or to exercise any of the other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is complex or you have made a number of requests. In this case, we will notify you and keep you updated. Should we be unable to comply with your request, we will provide an explanation.

## 8. Contact Information

If you have any questions or otherwise need to contact us, you can do so using the contact information below.

<p><b>To Contact Textron Specialized Vehicles Inc. (d/b/a Pace Technologies, LLC) (Controller)</b></p> <p>Pace Technologies, LLC 1451 Marvin Griffin Rd. Augusta, GA 30906 Phone: 888-706-4849 Email: <a href="mailto:tsvdataprivacy@textron.com">tsvdataprivacy@textron.com</a></p>	<p><b>To Contact Our Data Protection Officer</b></p> <p>VeraSafe 100 M Street S.E., Suite 600 Washington, D.C. 20003 USA +1 (617) 398-7067 <a href="mailto:experts@verasafe.com">experts@verasafe.com</a></p>
<p><b>To Contact Our Representative in the EU/EEA</b></p> <p>VeraSafe Ireland Ltd. Unit 3D North Point House North Point Business Park New Mallow Road Cork T23AT2P Ireland +420 228 881 031 <a href="mailto:article27@VeraSafe.com">article27@VeraSafe.com</a></p>	<p><b>To Contact Our Representative in the UK</b></p> <p>VeraSafe United Kingdom Ltd. 37 Albert Embankment London SE1 7TL United Kingdom +44 (20) 4532 2003 <a href="mailto:article27@VeraSafe.com">article27@VeraSafe.com</a></p>