PRIVACY POLICY

Freewill Mobile Application (Test Version)

Last updated: February 15, 2026

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1. Overview

This Privacy Policy explains how Freewill collects and uses information during its **testing and pilot phase**.

We are committed to respecting your privacy and handling data responsibly.

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2. Information We May Collect

During testing, we may collect:

a) Account & Device Information

- anonymous identifiers;
- device type, OS, language, diagnostics.

b) Usage Information

- feature interactions;
- performance and error data.

c) Location & Motion Data (Optional)

- GPS location;
- trip and parking events;
- motion states (only with explicit permission).

d) Vehicle Information (Optional)

- VIN;
- odometer photos;
- test vehicle data.

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3. Purpose of Collection

Data is collected **only to**:

- test and improve product features;
- evaluate experimental pricing and risk models;
- understand usage patterns;
- ensure platform stability and security.

Data is **not used** to issue insurance policies.

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4. Automated Decision-Making

Certain features may use automated or algorithmic processing for simulation, analysis, or experimental purposes.

These processes do not produce legally binding decisions and have no legal or contractual effect during the testing phase.

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5. Consent and Control

Consent is requested clearly and separately for each category of optional personal information, including location, motion, and vehicle data.

You may grant or withdraw permissions at any time via device settings.

Withdrawing consent may limit test features.

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6. Sharing of Information

We may share data with:

- service providers supporting testing and infrastructure;
- partners assisting with analytics or development;
- authorities where legally required.

We **do not sell** personal information.

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7. Data Retention

Data is retained only as long as necessary for testing, research, and legal compliance.

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8. Security

We apply reasonable technical and organizational safeguards to protect data during testing.

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9. Confidentiality Incidents

If a data incident occurs, we will assess risk and notify affected users and authorities where required by law.

Freewill maintains a register of confidentiality incidents, in accordance with applicable legal requirements.

Freewill evaluates privacy impacts as part of its product development and testing processes.

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10. Your Rights

Subject to applicable law, you may:

- access your data;
- request correction;
- request deletion;
- withdraw consent.

Requests: nic@freewillauto.com

11. Data Location

Data is processed and stored in Canada.

12. Changes to This Policy

This Policy may change as the product evolves. Continued use indicates acceptance.

13. Contact

Privacy Officer - Freewill Auto Inc.

Email: **nic@freewillauto.com**