THE REINALT-THOMAS
CORPORATION

Policy on the Appropriate Use of Business Information (Acceptable Data Use Policy)

7/30/2025

Amendments to this Policy will be posted on the Knowledge Center
and will be effective when posted.

Confidential Information

Revision	Description of Change	Date	Initials
1.0	Initial version		EDM Team

1. Overview & Purpose

In executing on the Company's strategy of providing the most inviting, easy, and safe tire and wheel purchase and service experience in the world, the Company collects, creates, receives, and maintains information about its customers, partners, products, and business operations. The Company treats this data as a strategic asset.

In an increasingly data-driven environment, safeguarding data is critical to maintaining operational integrity, complying with legal and regulatory obligations, and preserving the trust of our clients, partners, and employees. This policy establishes requirements for the appropriate and responsible use of data to prevent unauthorized access, disclosure, or use without proper approval or consent.

The intent of this policy is to establish requirements for the appropriate use of data in the ordinary course of business in support of the Company's business objectives and legal and regulatory requirements. It reflects our commitment to maintaining trust in our brand with the responsible management of the data entrusted to us and supports our intent to operate with integrity and transparency.

2. Scope

This Policy applies to Company personnel, affiliates and subsidiaries and their protection of the Company's data generated, maintained, or received in the ordinary course of business regardless of format. This policy supersedes all other guidance on the appropriate use of the Company's data.

All access to data is strictly dependent on a user's role & responsibilities within the Company.

3. Definitions

For the purposes of this Policy, the following terms shall have the meaning set out below:

Collection means the process of gathering data or information for use in business decision-making, including transacting with a customer, conducting research, and other purposes.

Confidential Business Information means non-public information of the Company that provides the Company with an advantage over its competitors. Confidential business information includes, but is not limited to, product and service information, customer data, financial records, strategic plans, trade secrets, proprietary technologies, and any other information that could potentially harm the Company's competitive advantage if known by others.

Company Data ("Data") refers to any collection or representation of raw data, information, or knowledge, in part or whole, created, received, used, or otherwise processed, by employees, contractors, or representatives of Discount Tire and its affiliated entities holding meaning, value, or significance to the Company regardless of medium, format, or location.

Refer to the **Examples of Company Data** table for illustrative purposes. This list is intended to provide clarity on data types but is not exhaustive.

Examples of Company Data	
Transactional Information	*- Contracts* *- Sales Invoices, Receipts, Work Orders* *- Payment records*
Proprietary Information	*- Business Intelligence and Insights, dashboards, data analysis models, and algorithmic data* *- Business Strategy and any representation of it* *- Company incorporation and structure information* *- Company branding phrases and logos, e.g. "We Do This Together"* *- Tire Testing methods and analysis*
General information created in the course of Company business or in representation of the Company	*- Any representation of fact, knowledge, or opinion* *- Chats, emails, texts, and other messaging* *- Collections of data sources and warehouses* *- Customer and Employee personal information* *- Digitally generated or handwritten notes, including those generated by AI transcription* *- Financial forecasting, analysis, and other reporting* *- Photos or video of company activities and its people regardless of location* *- Social Media posts and comments related to the Company*

Personal Information means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

Secondary Use means using information without consent for purposes unrelated to the original reasons for which it was collected.

4. General Approach

A. General Guidelines on the Use of Business Information

The appropriate use of business information by Discount Tire employees is based on the following principles and guidelines, which are to be incorporated into the development and operations of the Company's processes, systems, and products:

- All access and use of data is for legitimate business purpose.
- All data access and use should take into consideration the Information Classification Policy.
- All access and use of data is limited to its originally intended, consented purpose.
- The intended use for data is clearly defined at the system and/or process level.
- Inappropriate access, use, or sharing of data is controlled by systematic measures where possible to prevent access by those who would otherwise be unable to access such information.
- Data analysis models are strictly used as originally intended, using data as originally designed.
- Proactive measures are in place to prevent data use for unauthorized secondary purposes.

B. Access to Employee Data by Authorized Employees

Employee data, specifically personal information, is safeguarded by role-based access controls and only accessed on a need-to-know basis.

Authorized employees may need to access or view employee email and content for business purposes. Managers have the authority to request access to employee work product and documents as necessary for business continuity purposes.

C. Use of Generative AI or Other Emerging Technology

Generative AI (GenAI) tools are a class of artificial intelligence tools that are designed to create content, including but not limited to text, images, audio, video, and even software code. An example of these is ChatGPT, which is an AI-based large language model (LLM) designed to be more conversational than traditional AI tools.

If GenAI tools are used as a resource, users are responsible for the AI- generated content that they rely on, and care should be taken to protect the Company from liability and reputational risk.

- Do not blindly rely on anything created by GenAI. Ensure a human subject matter expert reviews the AI contribution. This is especially important for code, court cases, URLs, and other factual assertions. Employees are responsible for the errors introduced by GenAI.
- Unless you have licensed a GenAI tool that ensures confidentiality, assume that everything input into a GenAI tool will be used to train that tool and potentially used in a response to another user. Treat any information you post into these tools as if you were posting it on a public social media site.
- Do not use the Company's intellectual property, confidential business information, or personal information with GenAI tools. Company intellectual property includes, but is not limited to, custom software, algorithms, etc. Confidential business information includes, but is not limited to, financial data, acquisition and divestiture opportunities, attorney-client privileged information, etc. Personal information includes, but is not limited to, name, address, SSN, etc.

It is prohibited for employees or contractors to "upload", share or link confidential business information or personal information into third party Generative AI services without prior review and approval from Information Security, Privacy or Information Lifecycle Management (ILM) teams.

In alignment with the Company's data protection and information security best practices, employees are authorized to use pre-approved Generative AI software in alignment with this Policy.

Generative AI-generated outputs shall not:

- Be used verbatim in the Company's business services without human review.
- Be assumed to be truthful, credible or accurate.
- Be treated as the sole source of reference.
- Be used to issue official statements (i.e., legislation, policy or regulations).
- Be solely relied upon for making final business decisions for the Company.
- Be used for anything unethical or any illegal activities.

5. Related Policies

The following Policies and Best Practices are related to the elements contained in this Policy and may be of value to employees charged with its execution.

a. Security Awareness and Acceptable Use Policy
b. Privacy Policy

c. External Privacy Policy (online)
d. Third Party Data Sharing Policy
e. Third Party Data Privacy Requirements
f. Information Classification Policy
g. Information Security Policies and Procedures
h. Records and Information Management Policy