



## VisionTrack – Privacy Policy

*Last updated: November 29, 2021*

VisionTrack Inc (“**VisionTrack**” or “**we**”) is a multi-award-winning video telematics and CCTV device provider. VisionTrack is the video technology enabler of choice for many of the world’s leading telematics providers. We work mainly with business partners, including Insurance companies, telematics service providers, lease companies, vehicle manufacturers, corporate fleet customers (**Fleet Management**) and resellers.

We will not usually engage directly with the driver of the vehicle; information is provided to us (usually through our Autonomise.ai Platform) by the Insurer, telematics service providers lease company, the reseller, or the Fleet Manager.

We respect your privacy and are committed to protecting it. Please read this policy carefully before sharing information with us so you understand our practices regarding your information. This Privacy Policy (the “Policy”) describes the types of information may collect from you, your employer or that you may provide when you visit our websites, use/access our Autonomise.ai Platform, drive a vehicle fitted with our vehicle dashcams and telematics technologies, or communicate with us, as well as how we collect, use, disclose, and share that information. By accessing our website, Products, Services and the Autonomise.ai Platform, you agree to the terms of this Policy and our use, sharing, and disclosure of information as described below or in any revisions to this Policy. If you do not agree with the practices described in this policy, you may choose not to use our website or applications.

### Who do we collect information about?

Previous, current and prospective customers, Drivers who are authorized to drive the vehicles equipped with the cameras, telematics device, Fleet Managers, Business Partners (Insurers, and other telematics companies), Resellers & Users of our Platform.

### Personal Information we may collect about you

The types of personal information we collect and process typically fall into the following categories:

- Identity information — first name, last name, account username and password.
- Employment information — employer name and job title.
- Employer Address
- Contact information — billing address, delivery address, email address, and telephone number
- Usage information — details regarding when and how you use our website, the Autonomise.ai platform, our products, or services.
- Marketing and communications information — requests for information received from you,

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and information on your marketing or communication preferences.

- Vehicle Registration(s)
- Vehicle Make
- Vehicle Model;

## **When do we collect Personal Information about you**

At the time a product is connected to the Autonomise.ai Platform (for example driver details will be added to the customer's account on our platform), when a new driver is allocated to a vehicle and is added to the Platform, when the vehicle ignition is on although some devices also capture information for a period of time after the ignition is switched off, when our business partners or customers contact us (by phone, email, through our website or otherwise) to update their driver's details, when a business partner contacts us to make a complaint, a promotion, or survey, or when you report a problem with our website, platform or any other activity undertaken by VisionTrack.

## **Information we Collect through Vehicle Telematics Products or the Autonomise.ai Platform**

When you use our telematics products (including but not limited to our dashcams, telematics devices, in cab cameras, and support software applications), Autonomise.ai Platform, we may collect the following types of information from you:

- Usage details – Details of your access to and use of the applications, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the applications;
- Device information – Information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number;

The types of non-personal personal we may collect and use include, but are not limited to: (i) Media Access Control address (as an anonymous unique device ID); (ii) User ID (as an anonymous unique user ID); (iii) Crash or error reports; (iv) device type; (v) language; (vi) OS version; (vii) SDK version; (viii) device model; (ix) display type; and (x) country. This data is used to improve the services offered to you.

## **How We Use Your Information**

We use these types of information to perform our contracts or agreements with you, to comply with our legal obligations, as necessary for our legitimate interests, or pursuant to your consent. Specifically, we use this information to:

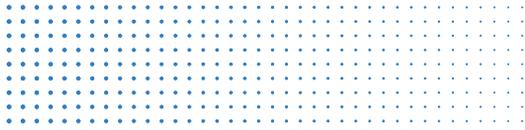
- Present the website and its content to you;
- Provide you with information, products, or services that you request from us and optimize your experience on our websites or with our applications and products;

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- Provide customer support, permit service and customer satisfaction evaluations, process online transactions, or otherwise manage our relationship with you or your company;
- Assist you in managing account profiles, registrations, and activities in “log-in” areas of the websites,
- Notify you about changes to our website or any products or services we offer;
- Communicate with you by e-mail, postal mail, telephone, or mobile device about our products, services, and issues relevant to your products, services, or industry;
- Perform research and analysis about your use of, or interest in, our products, services, or websites;
- Update and improve our products and services; and
- Perform other functions as otherwise described to you at the time of collection.

### Other Information we collect and use

We collect information when you use our website and/or Autonomise.ai Platform including data that allows us to monitor your preferences and how you use our website/Platform. Like most major websites, our websites use cookies, flash cookies, web beacons, and web tracking and analytics software to collect information about you. Using these technologies allows our web servers to automatically recognize you when you return to our websites and store information about your preferences, allowing us to customize our website according to your interests. This enables us to tailor our service offering (including the website) to provide you with products and services which are more relevant to your individual tastes to improve your experience. The information collected through these technologies may be combined with personal information or aggregated with other information on website visits.

Cookies cannot be used by themselves to identify you. Nevertheless, you may change your website browser settings to reject cookies, although please note that if you do this it may impair the functionality of this Website. For further information about cookies, including how to refuse cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). We do not honor “Do Not Track” signals.

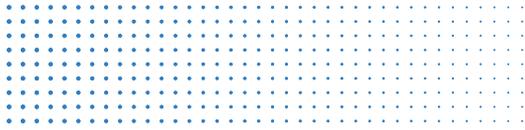
The information we collect includes: details of transactions you carry out through our website/Platform, information that you provide by filling in forms on our website/Platform even if those forms are not submitted, technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type, and version, time zone setting, browser plug-in types and versions, operating system and our Platform, information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We may use cookies to collect information about how our website is used

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## Disclosure of Your Information

We may disclose aggregated information about users, and information that cannot be used to identify an individual, without restriction.

- In addition, we may disclose information that we collect or that you provide:
- To our subsidiaries and affiliated companies;
- To contractors, service providers, and other third parties we use to support our business, including companies that perform work necessary for us to provide products and services to you or that will assist us in improving the products and services we provide to you;
- To our business partners or Reseller Partners, such as your insurer, your employer (or their contracted fleet management company) or a third-party telematics company to whom we provide devices and/or monitoring and reporting services. Access can be via our Platform or in some cases API.
- To a buyer or other successor controller prior to or in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of VisionTrack's assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, where the information is among the assets being transferred; and
- For any other purpose disclosed by us when you provide the information.

We reserve the right to disclose your information as necessary to comply with a subpoena or similar investigative demand, court order, request for cooperation from law enforcement or other governmental agency, to exercise our legal rights, to defend against legal claims, or as otherwise required by law.

## Your Choices About Collection and Use of Your Information

We strive to provide you with choices regarding the personal information you provide to us. For example, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our websites may not be accessible or may not function properly.

You can also choose not to provide us with certain information requested through our website, but that may result in you being unable to use certain features of our websites or our applications, request information about products or services.

## Reviewing, Correcting, or Deleting your Personal Information from our Systems

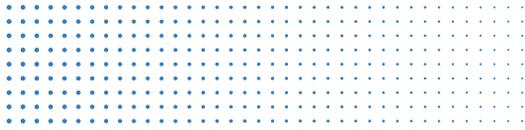
If you believe that the personally identifiable information which we hold about you is not correct, or if you would like to have your personal information removed from our records, please write to us at our registered office (see below) or email us at [dataprotection@visiontrack.com] explaining the personally

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identifiable information which you wish to be deleted, modified, or removed.

Once we have received your request, we will review it and contact you within 30 days of our receipt of your request, unless your request is complex or you have made a large number of requests, in which case we will notify you of any delay and will, in any event, reply within three (3) months.

### **Our Account Information and Password**

Where you have created an account to access certain parts of our websites, you are responsible for keeping your account information, including username and password, confidential. Please do not to share such account information or passwords with anyone and remember to log out when you are not using our website to prevent unauthorized access.

### **International transfers**

VisionTrack is headquartered in California, but your Personal Information is stored on our servers in the United States, and in the United Kingdom. If your information was collected outside the United States, but not within the EU, it may be necessary to transfer your information to the United States for processing in order to provide you with requested products and services. You understand and agree that information you provide may be sent to and processed by VisionTrack in the United States and the United Kingdom. The data protection laws in the United States may not be the same as the data protection laws in your home country.

We may transfer your information to some of our third-party providers located in the United States or other countries. We do our best to ensure a similar degree of security by ensuring that contracts, code of conduct, or certification are in place which give your personal data the same level of protection.

We will also transfer your information to our parent company VisionTrack Limited, in the United Kingdom. We and our parent company regard the lawful and correct treatment of your personal information as vital to achieving our objectives, it is imperative to the success of our operations and to maintaining your confidence and the confidence of others with whom we deal. We therefore ensure that our organization, both in the United States and the United Kingdom treats personal information fairly, lawfully and transparently. To this end VisionTrack Limited fully adheres to the Data Protection Principles, as set out in the GDPR when processing your data.

### **California residents' rights**

If you are a resident of California, you have the right to request information from us regarding the manner in which we share certain categories of personal information with third parties for their direct marketing purposes. California law gives you the right to send us a request at a designated address to receive the following information:

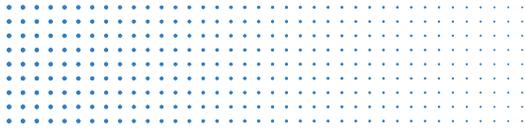
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- The categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year
- The names and addresses of the third parties that received that information
- If the nature of the third party's business cannot be determined from their name or examples of the products or services marketed, we may provide this information in a standardized format that is not specific to you. The designated email address for these requests is [dataprotection@visiontrack.com].

### EEA residents' rights

As indicated above, VisionTrack Inc is headquartered in the United States. Its applications, products, and services are intended for use or purchase by corporations in the United States. Its websites are likewise intended for visitors in the United States. VisionTrack does not intentionally offer or market its goods or services to individuals inside the United States or to Individuals or corporations outside the United States and does not intentionally seek information relating to such individuals or corporations. As such, VisionTrack is subject only to the laws of the United States.

Residents from the European Economic Area and Switzerland ("EEA") may, from time to time, visit our website. While VisionTrack maintains that it is not subject to the privacy laws applicable in the EEA, including the General Data Protection Regulation (GDPR), residents of the EEA should be aware of the rights afforded by the GDPR. Specifically, to the extent applicable, you may request information regarding the processing of your personal information, how your personal information was obtained (if you did not provide it directly), who it may have been shared with, and how long it will be retained. Further, you have the right to request your personal information be corrected if it is inaccurate and, in certain circumstances, may ask that it be erased or that further processing be stopped. Finally, subject to certain limitations, and when feasible, you may request a copy of your personal information or that it be transferred to another entity.

Additional information on your rights under the UK General Data Protection Regulation is available from the United Kingdom's Information Commissioner's Office. If you are located in the E.U. and have a concern about our processing of your data, you may have the right to make a complaint to the appropriate data protection authority in your E.U. country of residence.

### How We Protect Your Personal Information

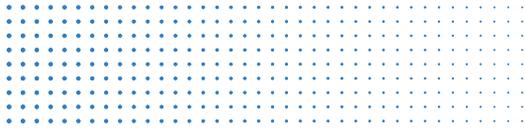
We take appropriate security measures (including physical, technical, and administrative measures) to help safeguard your personal information from unauthorized access and disclosure. No system, however, can be completely secure. We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our contractual, legal and regulatory obligations.

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We have implemented a Document Retention Policy which specifies how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention period is 7 years from the end of the service contract

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the “How to Contact Us” section below.

While we take steps to secure your personal information, we do not promise that your personal information, searches, or other questions will always remain secure. We are not responsible or liable for the illegal acts (such as hacking) of third parties. If you have concerns about the security of your personal information, please contact us at [dataprotection@visiontrack.com]

### How we protect your information

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore developed a range of organizational, procedural, and technical security measures designed to protect your personal information from unauthorized use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length and history;
- Auditing of system users and administrators;
- Regular backup schedules and disaster recovery environment for key systems and services;
- Secure file transfer methods are used to encrypt data;
- Usage of data loss prevention tools;
- Data breach detection: Security tools in place to detect unusual or abnormal activity;
- Data breach investigation: Audit and logging tools used to investigate any potential or reported breaches; and
- Data breach response: A plan that pulls together our compliance, data protection, legal and IT security teams to ensure rapid assessment and mitigation of data breaches.

### Children's Privacy

Our website is a general audience site and is not directed at, or intended for use by, children under 13. Accordingly, we do not knowingly collect personal information from children under the age of 13.

### Changes to this Privacy Policy

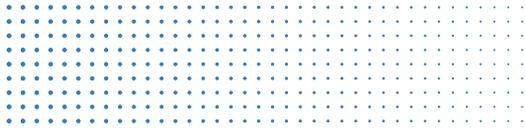
Please note that we keep our Privacy Policy under review and we may change this policy from time to

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time. If there are changes to our Privacy Policy, we will post them here and update the “Last Updated” date at the top of this document. Continued use of this Website after any changes is deemed to be acceptance of those changes. Accordingly, we encourage you to check the Privacy Policy periodically for updates.

Contractual conflicts with this privacy policy

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

### How To Contact Us

If you have any questions about this Privacy Policy or our information-handling practices, please contact us at [dataprotection@visiontrack.com]

Visiontrack Inc, [dataprotection@visiontrack.com]

Where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

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