

I-TRACKING (S) PTE LTD (UEN: 201332406E)

Data Protection and Privacy policy

This data protection and privacy policy (the “**Privacy Policy**”) sets out the manner in which we may collect, use, disclose or otherwise process the data, whether true or not, about an individual who can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access (“**Personal Data**”) in accordance with the Personal Data Protection Act 2012 of Singapore, as may be amended from time to time (“**PDPA**”). This Privacy Policy applies to all users of our website, <https://www.i-tracking.com.sg/> (the “**Website**”).

1. Collection of information

1.1 We, **I-Tracking (S) Pte Ltd** (UEN: 201332406E), are a company incorporated in Singapore and in the business of providing Global Positioning System (“**GPS**”) tracking, fleet management, and related location-based services. As part of our wider suite of services, we provide, operate, and maintain GPS tracking and fleet management solutions by configuring GPS tracking devices in vehicles and/or assets for our customers. These services include the generation of tracking reports, alerts, route histories, and analytics, as well as the provision of technical support, troubleshooting, and customer support from time to time (together, the “**Services**”).

1.2 In order for us to provide the Services, we collect and use certain Personal Data identified below. While the specific types of Personal Data you submit through our Website may vary depending on the Services provided to you, we have identified the following broad categories of Personal Data which may be collected by us in order to provide our Services, namely:

- (a) **Name.**
- (b) **Identity Data**, which includes your country of residence, job title, age, marital status and/or gender, NRIC number, FIN number, Passport number (if applicable).
- (c) **Contact Data**, which includes your e-mail address, fax and/or telephone number.
- (d) **Transaction Data**, which includes your payment related details, billing address, mailing address, payments and orders to and from you, and other details of products and services from us.

- (e) **Usage Data**, which includes information about how you use our Website (including the time you visit our Website, the duration of your Visit, the types of products and/or services you are searching for and/or how you are searching for such products and/or services), and account login credentials with our website.
- (f) **Marketing and Communications Data**, which includes your interests, feedback, survey responses, preferences in receiving marketing materials from us and your communication preferences, as well as your preferences for particular products or services.
- (g) **Technical Data**, which includes your Internet Protocol (“IP”) address, the internet device identity or media access control address of your device, information regarding the manufacturer, model or operating system of the device that you use and/or information about the web browser that you use to access our Website.
- (h) **GPS and Vehicle Data**, which includes real and historical location data of tracked assets (including vehicles), driving behaviour data including speed, braking and acceleration patterns and vehicle registration numbers and details associated to such vehicles.
- (i) (Collectively, “**Personal Data**”)

1.3 **How we collect your Personal Data**

We collect your Personal Data:

- (a) **Directly from you**. When you do any of the following (whether on your own behalf or on behalf of your organisation):
 - (i) use our Website;
 - (ii) create an account on our Website;
 - (iii) enter into a contract with us, purchase our products or engage our Services;
 - (iv) apply for or enquire about our Website, products or Services;
 - (v) participate in a promotion, survey, event or other marketing campaign organised by us;
 - (vi) subscribe to our newsletters or alerts;
 - (vii) request marketing materials to be sent to you; or

- (viii) contact us -- for example, if you get in touch to give us some feedback.
- (b) **From your authorised representatives and/or personnel.** We may also collect your Personal Data from your authorised representatives and/or personnel. These include persons whom you have authorised and persons who have been validly identified as acting on your behalf, and personnel (such as drivers and operators of vehicles/assets) where our Services may be deployed. It is your responsibility to inform such drivers and/or operators (if applicable) that Personal Data such as GPS and Vehicle Data may be collected from them.
- (c) **When you interact with our Website.** As you interact with our Website, we may automatically collect your Technical Data. We may collect such personal data by using website cookies or other forms of technology.
- (d) **When you engage our services.** GPS and Vehicle Data forms a crucial part of the Services to be provided to you. Depending on the nature and scope of Services, the GPS and Vehicle Data will be obtained from our customers vehicles and assets.
- (e) **Third parties or publicly available sources.** We may receive your Personal Data from third parties which are located in various countries. These include:
 - (i) Technical Data from analytics providers, advertising networks and social media platforms; and
 - (ii) Contact and Transaction Data from providers of technical, payment and delivery services.

2. Purposes for processing your Personal Data

2.1 We may collect and use your Personal Data for any or all of the following purposes:

- (a) To register you as a new customer.
- (b) To verify your identity.
- (c) To provide our Services to you, especially through GPS and Vehicle Data.
- (d) To manage your account, including managing payments, fees and charges and collecting and recovering money owed to us.
- (e) To manage our relationship with you.

- (f) To administer, operate, provide, maintain and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, as well as ensuring that unauthorised users do not access the information on our Website).
- (g) To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve you.
- (h) To make suggestions and recommendations to you about products or services that may be of interest to you.
- (i) To send you relevant information about our events, news announcements or promotions.
- (j) To enable you to complete a survey or participate in a promotion, survey, event or other marketing campaign organised by us.
- (k) To contact you in relation to all of the above.
- (l) To comply with any applicable laws, regulations, codes of practice, guidelines or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.
- (m) Any other purposes for which you have provided the information.
- (n) Any other incidental business purposes related to or in connection with the above.

2.2 The purposes listed above may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

2.3 **Promotional offers and marketing**

If you supply us with your Contact Data, you may receive periodic mailings, calls, e-mails, messages or faxes from us with information about new products and services or upcoming events. We will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your Personal Data to any third party for such marketing.

If you no longer wish to receive such mailings, faxes, messages, e-mails or calls, you may withdraw your consent by logging into our Website and updating your preferences by e-mailing us.

2.4 Cookies

We use cookies to provide visitors with a personalised experience on our Website. Cookies are pieces of information that a website transfers to the memory or hard drive of a visitor's computer for record-keeping purposes. We use cookies to allow access without re-entering the visitor's User ID, to make improvements, and to better tailor our Website to our visitors' needs. We also use this information to verify that visitors meet the criteria required to process their requests.

Most browsers used by visitors have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. However, if you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. In addition, you can delete cookies from your browser program at any time.

2.5 Change of purpose

We will only process your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If there is any change to the purposes for which we collect or use your Personal Data, we will inform you of such change by way of email and/or calls before or during the collection or use of your Personal Data. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via email. If we need to use your Personal Data for a new purpose, we will notify you before such use and obtain your consent to the use of your Personal Data for such purpose where we are required to do so by law.

3. Disclosure of information

3.1 We may share and disclose your Personal Data to our Affiliates and third parties in limited circumstances as set out below:

- (a) We may share your Personal Data with our suppliers, agents or contractors in connection with services they perform for us or pursuant to agreements with our suppliers.

- (b) We may share your Personal Data with third parties to comply with a legal obligation, when we believe in good faith that an applicable law requires it, at the request of government authorities conducting an investigation, to verify or enforce our contractual rights or other applicable policies, to detect and protect against fraud or any technical or security vulnerabilities, to respond to an emergency, or otherwise to protect the rights, property, safety or security of third parties and visitors to our website or the public.
- (c) As we continue to develop our business, we may sell or purchase assets. If another entity acquires or merges with us, your Personal Data will be disclosed to such entity.
- (d) Also, if any bankruptcy or reorganisation proceeding is brought by or against us, all such information will be considered an asset of ours and as such it is possible they will be sold or transferred to third parties.

3.2 We do not disclose your Personal Data to unaffiliated third parties for their independent use unless we have obtained your consent to do so and pursuant to executing confidentiality agreements with such unaffiliated third parties. We also require all third parties to respect the security of your Personal Data and to treat it in accordance with the applicable law.

4. Retention of information

- 4.1 We only retain your Personal Data for as long as is necessary for us to process your Personal Data as described above. However, please be advised that we may retain some of your Personal Data after you cease to use our services, for instance if the data is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.
- 4.2 In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

5. International transfers of information

We may transfer your Personal Data to countries outside of Singapore and if we do so, we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA. For example, we will always ensure that there is a proper legal agreement that covers the data transfer.

6. Security

Our management and its teams take commercially reasonable precautions to keep all information obtained from our online visitors secure against unauthorised access (eg, data

breach), collection, use, disclosure, copying, modification, or disposal, or similar risks, and we periodically review our security measures. Although there is no way that any company can absolutely guarantee the security of your Personal Data, we are committed to employing reasonable security measures, regularly reviewing and assessing our security practices, and taking legally appropriate steps. You are responsible for keeping your login information and passwords confidential.

7. Collection of information from children

7.1 I-Tracking (S) Pte. Ltd. does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not use this website without a parent or guardian nor provide Personal Data to us of any kind whatsoever.

8. Making changes to your Personal Data

9. Links to other sites

Our Website may contain links to other sites. These sites are not covered by this Privacy Policy, and we are not responsible for the privacy practices or the content of these sites.

10. Changes to the Privacy Policy

We reserve the right to modify this Privacy Policy and related business practices at any time by posting updated text on this page or sending you notice of such changes where appropriate. Please check this page periodically for updates. Your continued use of our Website and Services constitutes your acknowledgement and acceptance of such changes.

11. Contact us

If you have any comments, questions or complaints about our Privacy Policy, please contact us via email.