

PRIVACY POLICY

Last updated: April 25, 2018

Your privacy is important to Track Smart Telematics Cyprus LTD. We developed this Privacy Policy to provide you with information on how we process your personal data when you create a Track Smart Telematics Cyprus LTD account, interact with our customer support specialists, visit www.trackcy.com or visit other Track Smart Telematics Cyprus LTD websites or use Track Smart Telematics Cyprus LTD apps that include a link to this Privacy Policy

Other Track Smart Telematics Cyprus LTD websites, apps and products that do not include a link to this Privacy Policy and include a link to a different Track Smart Telematics Cyprus LTD privacy policy are governed by that privacy policy.

“Personal data” is information relating to an identified or identifiable natural person.

Please see sections of this Privacy Policy

- Categories of Personal Data Processed by Track Smart Telematics Cyprus LTD
- Categories of Recipients of Personal Data
- Transfers of Personal Data
- Cookies and Similar Technologies
- Privacy Policy Updates
- Retention of Personal Data
- Data Controller
- Your Rights



Categories of Personal Data Processed by Track Smart Telematics Cyprus LTD

Personal data that is processed when a Track Smart Telematics Cyprus LTD account is created:

When a Track Smart Telematics Cyprus LTD account is created, we ask you to provide your email address and name. You can choose to provide only your first name or a nickname instead of your full name if you wish.

PURPOSES AND LEGAL GROUNDS:

(a) Track Smart Telematics Cyprus LTD processes your email address because you use your email address and your password to sign in to your account. The legal ground for processing your email address for this purpose is based on Track Smart Telematics Cyprus LTD's legitimate interest in protecting the security of your account.

(b) Track Smart Telematics Cyprus LTD also processes your email address for the purpose of sending you important information about your Track Smart Telematics Cyprus LTD products, apps or account, such as important safety information or material changes to this Privacy Policy. The name you provide is associated with your account profile, and is displayed when you submit comments or other material on a Track Smart Telematics Cyprus LTD website or app. The legal ground for processing your email address and name for these purposes is Track Smart Telematics Cyprus LTD's legitimate interest in providing you important safety or other information about your Track Smart Telematics Cyprus LTD products, apps or account or material changes to this Privacy Policy

(c) If you provide your opt-in consent to receiving marketing information from Track Smart Telematics Cyprus LTD, Track Smart Telematics Cyprus LTD will also process your email address for the purpose of sending you marketing information about Track Smart Telematics Cyprus LTD products and apps. The legal ground for processing your email address for this purpose is your consent. You may withdraw your consent at any time by requesting to do so through the unsubscribe link at the bottom of our marketing emails.

(d) Track Smart Telematics Cyprus LTD also processes your email address to associate it with your Track Smart Telematics Cyprus LTD account when you interact with our customer support representatives. The legal ground for this processing is our legitimate interest in providing quality customer support.



Personal data that is processed when you communicate with Track Smart Telematics Cyprus LTD:

When you interact with our customer support representatives via email, telephone, online or in person, we collect personal data, such as your name, mailing address, phone number, email address and contact preferences; and information about the Track Smart Telematics Cyprus LTD products you own. We also may create event logs that are useful in diagnosing product or app performance-related issues, and capture information relating to the support or service issue. With your consent, our customer support representatives may sign in to your Track Smart Telematics Cyprus LTD account, if appropriate, to help troubleshoot and resolve your issue.

PURPOSE AND LEGAL GROUND:

We use this information to provide you with customer and product support and to monitor the quality and types of customer and product support we provide to our customers. The legal ground for processing this information for these purposes is Track Smart Telematics Cyprus LTD's legitimate interests in providing quality product support. The legal ground for signing in to your Track Smart Telematics Cyprus LTD account, if appropriate, to help troubleshoot and resolve your issue is consent, which you may withdraw.

Personal data that is processed when you use your Track Smart Telematics Cyprus LTD app:



If you use a Track Smart Telematics Cyprus LTD app no location is collected and upload from your device data such as location, speed, direction, and time and date of recording.

PURPOSE AND LEGAL GROUND:

This data is aggregated with data from other consenting users and is used to enhance the quality of our products and apps.

Personal data that is processed when you use location features on your Track Smart Telematics Cyprus LTD device or app:

If you elect to use location-based services, such as weather, traffic information, fuel prices, on your Track Smart Telematics Cyprus LTD app, then the physical location of your device will be collected, in order for Track Smart Telematics Cyprus LTD or our providers to provide you with such location-based services.

PURPOSE AND LEGAL GROUND:

The purpose of processing the location of your device is to provide you the location-based services you wish to use. The legal ground for processing this data for this purpose is performance of a contract.

Categories of Recipients of Personal Data

Real-Time:

Real-Time is a feature available on Track Smart Telematics Cyprus LTD devices that enables you to see in real-time location of your device. Because anyone with access to the account will be able to see the real-time location of your Track Smart Telematics Cyprus LTD device, you should use caution in determining to whom your login credentials are shared with as you do not want other to be able to view the location of your Track Smart Telematics Cyprus LTD device.

Other service providers:

Track Smart Telematics Cyprus LTD uses cloud services from third parties such as Open Street Maps to show street addresses and locations of Track Smart Telematics



Cyprus Ltd devices. No information of Track Smart Telematics Cyprus Ltd devices are shared with third parties.

Other disclosures:

We may disclose personal data about you to others: (a) if we have your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, legal process, or other legal obligation; (c) to enforce any of our terms and conditions or policies; or (d) as necessary to pursue available legal remedies or defend legal claims. We may also transfer your personal data to an affiliate, a subsidiary or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Track Smart Telematics Cyprus LTD's business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding, provided that any such entity that we transfer personal data to will not be permitted to process your personal data other than as described in this Privacy Policy without providing you notice and, if required by applicable laws, obtaining your consent.

Transfers of Personal Data

Track Smart Telematics Cyprus LTD is a local business. When you create a Track Smart Telematics Cyprus LTD account, add personal data in your account profile, or upload data to your Track Smart Telematics Cyprus LTD account, your personal data will be collected and stored on Track Smart Telematics Cyprus LTD local servers in Cyprus. Any transfers of personal data from Track Smart Telematics Cyprus LTD companies in the European Economic Area ("EEA") are done pursuant to European Commission approved Model Contractual Clauses.

Cookies and Similar Technologies

Websites:

To help analyze how you and other visitors navigate Track Smart Telematics Cyprus LTD websites, and compile aggregate statistics about site usage and response rates, we, with assistance from third-party analytics service providers, collect certain information when you visit our site. This information includes IP address, geographic location of the device, browser type, browser language, date and time of your request, time(s) of your visit(s), page views and page elements (e.g., links) that you click. We may use cookies, pixel tags, web beacons, clear GIFs or other similar tools on our site. We use this information to provide better, more relevant content on our site, to measure the effectiveness of advertisements, to identify and fix problems, and to improve your overall experience on our site. They may use a pixel tag or other similar technology to collect information about your visits to sites. For more information



regarding this practice and to opt-out of such collection and use of this information by our third-party service providers, please see Networkadvertising.org.

If you do not want information collected through the use of these technologies, there is a simple procedure in most browsers that allows you to automatically decline many of these technologies, or to be given the choice of declining or accepting them.

If you reside in the European Union or other jurisdiction that requires us to obtain your consent to use cookies on our sites, then you will have an opportunity to manage your cookie preferences on the sites; except that certain cookies are required to enable core site functionality, and you cannot choose to disable those cookies.

Privacy Policy Updates

We may update this Privacy Policy from time to time as we add new products and apps, as we improve our current offerings and as technologies and laws change. You can determine when this Privacy Policy was last revised by referring to the “Last updated” legend at the top of this page. Any changes will become effective upon our posting of the revised Privacy Policy.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by email or by posting notice of the changes on the Track Smart Telematics Cyprus LTD websites and apps that link to this Privacy Policy.

Retention of Personal Data

We will retain your personal data as long as your Track Smart Telematics Cyprus LTD account is considered to be active. In addition, see below under “Your Rights” for a description of your right of erasure.

Data Controller



If you reside in a country in the European Economic Area or in Switzerland, then your personal data collected by Track Smart Telematics Cyprus LTD is controlled by Track Smart Telematics Cyprus LTD which is located at 1 Alkidamou str, Agios Athanasios Industrial Area 4101, PO Box 50352, CY3603 Limassol Cyprus

Your Rights

If you reside in the European Union, you have the right under the General Data Protection Regulation to request from Track Smart Telematics Cyprus LTD access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, the right to object to processing of your personal data, and the right to lodge a complaint with a supervisory authority.

To request access to or rectification, portability or erasure of your personal data, or to delete your Track Smart Telematics Cyprus LTD account, contact Track Smart Telematics Personal in writing stating your exact intention and the reason for this.

If you live in the European Union and you wish to exercise your right to restriction of processing or your right to object to processing, contact Track Smart Telematics Cyprus LTD personal.