

# Privacy Policy

(SAFETRAC SOFTWARE, INC.)

This Privacy Policy governs your use of services, product or websites offered by Safetrac Software Inc. By using our services, website, or otherwise by interacting with us, you consent to this Privacy Policy. If you do not agree with the terms of this Policy, please do not engage in any of these activities.

Safetrac understands and respects your concerns about the use of your personally identifiable information, collected from you as a customer or visitor to our website or mobile app that identifies you as a specific person or entity ("personal information"). Personal information includes name, user account name, billing and shipping addresses, telephone numbers including mobile telephone numbers, Mobile Subscriber Identifier, Mobile Equipment Identifier, Network Address Identifier, IP address, audible utterances, email addresses and if a corporate entity, may also include company name. Personal information does not include anonymous or aggregate information, which after processing may not be associated with a specific person or entity. We believe that you should know what information about you we collect, as well as how that information is used, maintained, and, in some cases, shared.

The following sets forth our privacy practices and policies, applicable to Safetrac Software Inc. customers and visitors to the Safetrac Software Inc. website.

You acknowledge and understand that this privacy policy does not apply to our business partners or other companies that Safetrac Software Inc. does not own or operate. For information on how other providers of products or services handle personal information you provide through other websites or through the use of our services in conjunction with a third party, please consult their privacy policies.

## **WARNING! THIS APPLICATION USES GPS TECHNOLOGY TO RECORD USER LOCATION AND BEHAVIOR**

This Safetrac mobile application is designed to **ONLY** work with the GPS location services turned on. In order to log in and use the Safetrac application the GPS location services **MUST** be enabled. If you do not approve you may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

## **INFORMATION COLLECTED AND OUR USE OF SUCH INFORMATION**

We automatically receive certain types of information (such as user location or behavior) some of which may be associated with personal information when you log in to the Safetrac mobile application and create security, parking or maintenance issues using the Safetrac mobile application. **This application collects the following:**

- Date/Time Stamped Photography

- GPS Location
- Voice Audio Recordings
- Unique User Device ID
- Device Phone Number
- Device Make / Model
- Mobile Operating System Version
- Information About the Way You Use the Application
- User Account Name
- User Text Messages / Notes Created within an Issue

Each time you access the Safetrac mobile application services, we record your current exact or approximate GPS location (GPS Accuracy of location is dependent on location connectivity).

We record your current GPS location when your wireless device records an issue in order to determine the state, city and location you are in and display a location map. (which occurs, for example, when you log in and use the standard device recording icon options related to security, parking or maintenance issues).

We maintain a database with these locations, and may keep such information indefinitely. Safetrac shares your GPS locations with other users or partners.

When an issue ID within our website application is created, we share your location data, photographs, text messages and audio files submitted with your employer, clients of your employer or any other approved access members provided by your system administrator. The information shared may be any personally identifying information, such as your name, user account name, phone number or phone ID number and GPS location at time of the issue creation.

### **AUTOMATICALLY COLLECTED INFORMATION**

In addition, the Application may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile devices unique device ID, the IP address of your mobile device, your mobile operating system and information about the way you use the Application.

### **YOUR OPT OUT RIGHTS**

You can stop all collection of information by the mobile application easily by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network. You can also request instructions on how to opt-out via email, at [support@safetrac.io](mailto:support@safetrac.io)

### **WHEN YOU'RE INFORMATION WILL BE SHARED OR DISCLOSED**

Safetrac does not sell, rent, license or otherwise share information with unaffiliated parties except as explained in this privacy policy.

To the Primary Account Holder

We disclose personal information of an account user(s) to the primary account holder(s) (the party financially responsible for the account). If a business, governmental agency, or other individual obtains service for you, that entity or individual is our customer, and we may provide personal information about you, or your use of the service to them or others at their direction.

#### Legal Processes

We will comply with any subpoenas, court orders or other legal processes for any of the information about you in our possession, and we may use such information to establish or exercise yours, ours, or others' legal rights, or to defend against legal claims.

#### Business Transfers

Information about you in our possession may be disclosed as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of insolvency, bankruptcy, or receivership in which your personal information would be transferred as one of the business assets of the company. Safetrac Software Inc. does not guarantee that any entity receiving such information in connection with one of these transactions will comply with all terms of this policy.

#### **INFORMATION ON WIRELESS DEVICES**

The Safetrac software (and any upgrades, modifications, or additions thereto) that is factory installed or downloaded to, and resides upon your wireless device may retain your manually entered user account name and password, or reads it from the device. Having your carrier change the assigned phone number for your wireless device may not change the account number we maintain with regard to that device, which may result in your device not being able to access your Safetrac mobile application account established using the previous phone number. If this happens, please contact Safetrac Technical Support at [support@safetrac.io](mailto:support@safetrac.io) or call 310-601-6777.

#### **SECURITY OF PERSONAL INFORMATION**

Safetrac has implemented various physical, electronic and procedural safeguards to protect the confidentiality and security of personal information under our control. For instance, Safetrac limits access to Safetrac systems that store such information to authorized personnel. Safetrac also employs the Secure Sockets Layer (SSL) protocol to protect your personal information on our website.

While Safetrac maintains a multitude of security measures to prevent unauthorized access to or disclosure of your personal information, no security measures are absolute or wholly guaranteed. Safetrac will make reasonable attempts to notify you if it determines there were unauthorized acts by third parties that violate the law or this policy, or other security breaches, or where otherwise required by law.

Safetrac will maintain your information for as long as a business need exists, or as required by applicable laws, regulations, or government orders. When we dispose of personal information, we use commercially reasonable procedures to erase or render it unreadable.

### **CHILDREN'S PRIVACY**

Safetrac will not knowingly request or collect personal information from any person under 13 years of age without prior verifiable parental or legal guardian consent. If, however, you authorize a child to use our services or products by providing them a device associated with your Safetrac service, any personal information associated with such use will be treated as your information in accordance with this policy. Safetrac encourages parents to be involved in the online activities (including wireless Internet browsing) of their children to ensure that no information is collected from a child without parental or Guardian consent.

### **CUSTOMER REQUESTS FOR INFORMATION**

Customers are entitled to request information concerning whether a business has disclosed personal information to any affiliated companies or third parties. To protect your privacy and security, Safetrac will take reasonable steps to verify your identity before providing you access or making corrections. Good faith efforts to resolve requests to correct inaccuracies in personal information will be made by Safetrac, except where the request is unreasonable. As stated in this privacy policy, Safetrac will not sell or share your personal information with third parties for their direct marketing purposes without your consent. Customers who wish to request further information about our compliance with this law or have questions or concerns about our privacy practices and policies may contact us at [support@safetrac.io](mailto:support@safetrac.io)

### **CHANGES TO THIS POLICY**

Safetrac may from time to time update this privacy policy, and we encourage you to periodically review this privacy policy to be informed of the latest changes.

### **CONTACT INFORMATION FOR Safetrac USERS**

Safetrac takes its users' privacy concerns seriously, and if you believe that Safetrac has not complied with this Privacy Policy in regards to your personal information, you may write to the Safetrac Software Inc. at the following address:

**Safetrac Software Inc.**

**ATTN: Safetrac PRIVACY POLICY AGENT**

**2800 Plaza Del Amo**

**Unit 200**

**Torrance CA 90503**

**Email: [support@safetrac.io](mailto:support@safetrac.io)**

In your email / letter, please describe in detail — in as much detail as possible — the ways in which you believe that we have not complied with this Privacy Policy. We will investigate and verify your complaint in a timely manner.

