

## Privacy Policy

**Last update: January 2017**

Trackunit and its subsidiaries collect and use your data, to help you optimize your business and everyday life. We fully understand that you value your privacy. We believe privacy is about freedom and being able to decide for yourself how your data is used and by whom. This is why we have established our Privacy Principles:

### We will always keep you fully informed about your data.

We make sure you understand which data from or about you we use, why we use it, how long we use it and who can use it. We enable you to remain in control of your data. We consider the data from or about you to be yours. We only use it for the purposes for which you have given it to us, or for which we collected it from you. At any time, you can opt-out or opt-in using our software and websites. You are the Data controller and we are the Data processor. Trackunit is the data processor and you are the data controller in accordance with the Danish Act on Processing of Personal Data and the General Data Protection Regulation in the EU. Trackunit shall act only on instructions from you. Trackunit shall implement appropriate technical and organizational security measures to protect data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure, abuse or other processing in violation of the provisions laid down in the Danish Act on Processing of Personal Data and the General Data Protection Regulation in the EU. Upon request, Trackunit shall within reasonable time provide you with sufficient information enabling you to ensure compliance with the requirements for adequate technical and organizational security measures.

### We protect your data

Your data is yours. We keep it that way by protecting it as best as we reasonably can to prevent it from falling into the wrong hands. We do this through encryption, anonymization, or pseudonymization of your data. This way we keep your data safe. We will tell you which data from or about you we use, why we use it, how long we use it, who else can use it and where it is kept. We will only use your data for the purposes we have stated to you. We keep as little of your data as possible, and only for as long as we need it. When we no longer need data we destroy it or we irreversibly anonymize it, so it is no longer linked to you. If we ask your permission to use your data for specific purposes, we also always allow you to withdraw your permission. We will allow you to access and correct your data if it is linked to your Trackunit Manager. We will keep protecting your data against unauthorized access and accidental loss as best as we reasonably can. If we engage others to use your information on our behalf, we will ensure they act in accordance with our policies.

If we share your data with others, we will first ask you for permission, unless there is a legal obligation that prohibits us from asking. We are open to any questions you may have about how we use your data and we will answer them.

We operate according to the privacy laws applicable in your country. Because we are rooted in Europe, the General Data Protection Regulation is always in effect. These laws are considered to be

the most extensive in the world. They offer a high level of protection to you by only allowing us to use your data when the strict conditions of these laws are met. Our company policy on privacy and processing of personal data reflects these laws and we apply this policy globally.

## Definitions

*Personal Data*: any information relating to an identified or identifiable natural person ('Data subject', user); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

*Processing of Personal Data 'processing'*: any operation or set of operations which is performed upon Personal Data, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

## Trackunit will process Personal Data fairly and lawfully.

Trackunit will collect Personal Data for specified, explicit and legitimate purposes and will not further process Personal Data in a way incompatible with those purposes.

Trackunit will ensure Personal Data is adequate, relevant and not excessive in relation to the purposes for which they are collected and/or further processed.

Trackunit will ensure Personal Data are accurate and, where necessary, kept up to date.

Trackunit will keep Personal Data in a form which permits identification of its users for no longer than is necessary for the purposes for which the Personal Data were collected or for which they are further processed.

Trackunit will process Personal Data only if:

- a) the user has unambiguously given his consent; or
- b) processing is necessary for the performance of a contract to which the user is party or in order to take steps at the request of the user prior to entering into a contract; or
- c) processing is necessary for compliance with a legal obligation to which Trackunit is subject; or
- d) processing is necessary for the purposes of the legitimate interests pursued Trackunit, except where such interests are overridden by the interests for fundamental rights and freedoms of the user and in particular his right to privacy.

Trackunit will avoid processing Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or Personal Data concerning health or sex life.

Trackunit will avoid processing Personal Data related to persons under the age of 13 years.

To ensure fair processing of Personal Data, Trackunit will inform its users of: The purposes of the processing, the categories of the Personal Data concerned, the categories of the recipients of the Personal Data, how to access and rectify their Personal Data. We process data on your behalf, and

only under direct contract, or consent by you, you can at any and all time access, correct, or have your data deleted from our system. We only collect data from your machines via our Trackunit Hardware, no-other data is transferred to Trackunit. The Data we collect is as includes but is not limited to: Latitude, Longitude, Speed, Heading, number of kilometres, number of hours used, status of inputs, status of out-puts, we can upon your request register the operator, fuel usage and temperature of hydraulic oil. We always have the opportunity to access and correct your data on your behalf, only the relevant people at Trackunit have access to your Data. The employees who have access to your data, does this solely to assist you in any way possible, and to collect statistic data for further improvement of our Hardware and Software.

Trackunit implements appropriate technical and organizational measures to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where the processing involves the transmission of Personal Data over a network, and against all other unlawful forms of processing. Trackunit does so having regard to the state of the art and the cost of their implementation, ensuring a level of security appropriate to the risks represented by the processing and the nature of the Personal Data to be protected. In case processing is carried out on Trackunit's behalf, Trackunit will choose a processor providing sufficient guarantees in respect of the technical security measures and organizational measures governing the processing to be carried out, and will ensure compliance with those measure. In these cases, Trackunit will ensure the processing is governed by a contract binding the processor to the controller and stipulating in particular that: a) The processor shall act only on instructions from Trackunit; b) The provisions of this policy are applied to the processor. In principle Trackunit will process Personal Data in the European Economic Area (EEA). In those cases, where Personal Data is transferred or processed outside the EEA by Trackunit or on Trackunit's behalf, Trackunit will ensure adequate safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals and as regards the exercise of the corresponding rights by applying appropriate contractual clauses or other acceptable legally binding instruments. In case Trackunit remotely stores information, or gains access to (any) data already stored, in a device of a user, Trackunit will ensure the user concerned has given his or her consent, having been provided with clear and comprehensive information, about the purposes of the processing. This shall not prevent Trackunit from any technical storage or access for the sole purpose of carrying out the transmission of a communication over an electronic communications network, or as strictly necessary in order for Trackunit to provide a service explicitly requested by the user.

If you need your data transferred to another system, you can do so using our public API. If you have any questions or requests regarding this, you can always contact us at [DPO@trackunit.com](mailto:DPO@trackunit.com).

### Data we collect

When you use our sites, our products and our services we collect data from you or about you. What data we exactly collect depend on what you use and how you use it. In general, there are 3 categories of data we collect and use:

#### *Data you provide*

This is the data you enter yourself when using our sites, products and services. This data includes for example your name, email address, the search terms you enter, your address and favourite locations, your phone number, any map errors reports, your size, weight, gender, age etc. etc.

### *Data collected by sensors*

A lot of our products come equipped with one or more sensors or use the sensors of the devices they run on. Examples of sensors are GPS receivers, WiFi or Bluetooth receivers, a camera, a microphone, G-force sensors, heart rate sensors and touch sensitive screens. These sensors, when activated, will automatically collect data. Depending on the purpose for which it was captured, the data in combination with data that identifies you or your device can be sent to Trackunit and others for subsequent use.

### *Metadata*

This refers to any data that is collected or automatically generated while you use Trackunit sites, products or services. In many cases metadata is collected or generated inherent to you using a computing device or inherent to transmitting data over computer networks, such as the internet. This data includes user interface and other device usage events, IP-addresses, unique device identifiers, Wi-Fi and Bluetooth MAC addresses, cookies and records of computer activity.

Trackunit shall refrain from selling or disclosing data unless according to written agreement with the rightful owner(s) or according to court order. However, Trackunit have the right to analyse and disclose market statistics which, among other sources are based on anonymous operating data from Trackunit Hardware.

### *Trackunit account*

Trackunit uses your Trackunit account to grant you access to downloadable content, services you are subscribed to or have activated, software upgrades and sections of our website which need registration. We also use your Trackunit account when you want to purchase additional items and to tailor our offerings to you. The way in which Trackunit uses your Trackunit account also depends on the software and device or system you use.

We will use your email address occasionally to send information related to the products and services registered to your Trackunit account. We will only do this if there are updates you need to be aware of to ensure you can use your product in a safe, reliable way, without interruption or if there is a legal requirement to contact you. Should you wish to delete your Trackunit account, please contact Trackunit directly. We will not share your Trackunit account details with anyone else, unless they work under our responsibility, according to our instructions or when explicitly and lawfully ordered to do so following due legal process. You can write the DPO, Thomas Christiansen, directly at, DPO@trackunit.com. If you are not satisfied with your requests under this statement, this being, the right to transfer data, the right to rectify data or the right to retract your consent, you can always contact the Danish Data Agency (Datatilsynet), Datatilsynet.