



# PRIVACY POLICY FOR TRACKER GUARD MOBILE APPLICATION

This privacy policy governs your use of the software application of the Tracker Guard Mobile Application (“Tracker App”) for mobile devices. The Tracker App is designed for your peace of mind in the event of a breakdown or roadside emergency. Tracker will arrange for a guard to be dispatched to your location until your roadside service provider arrives to assist you. For your safety, Tracker Guard is available at all times. To activate the Tracker Guard service, use the button on the Tracker App to connect to a Tracker agent who will facilitate the dispatch of a Tracker Guard to your location.

## What information does the Tracker App obtain and how is it used?

### User Provided Information

The Tracker App obtains the information you provide when you download and register it. Registration with us is mandatory in order to enable you to use the Tracker App.

When you register with us and use the Tracker App, you generally provide (a) your name, email address, age, user name, password and other registration information; (b) transaction-related information, such as when you make use of the features in the Tracker App or respond to any offers from us; (c) information you provide us when you contact us for help; (d) optional credit card information for in-App purchases; and (e) information you enter into our system when using the Tracker App, such as contact information.

We may also use the information you provided to us to provide you with important information, required notices and marketing promotions.

### Automatically Collected Information

In addition, the Tracker App may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device’s unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, information about the location of your mobile device, measurements taken by the mobile’s sensors and information about the way you use the Tracker App.

## Does the Tracker App collect precise real time location information of the device?

When you open the mobile Tracker App and when it runs in the background, we may use GPS and other location technologies available on your mobile device for driver behavioural measurements and analysis. For purposes of the Tracker Guard service, we need access to your current location in order to determine the area or neighbourhood you are located within, and we may display a location map with relevant advertisements. We may share your current location with other users or partners for purposes of providing the Tracker Guard service, and to other third parties in anonymised format.

If you do not want us to use your location for the purposes set out above, you should turn off the location services for the Tracker App which is located in your account settings or in your mobile phone settings and/or within the



mobile Tracker App. This will however result in us not being able to locate you through the Tracker App for purposes of providing the Tracker Guard service.

**Do third parties see and/or have access to information obtained by the Tracker App?**

Yes. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.
- to advertisers and third party advertising networks and analytics companies as described in the section below.
- when displaying ‘calculated’ data on lists such as driver scoreboards.
- In providing the Tracker Guard service.

**Automatic Data Collection and Advertising**

We may work with analytics companies to help us understand how the Tracker App is being used, such as the frequency and duration of usage. We work with advertisers and third party advertising networks, who need to know how you interact with notifications and advertising provided in the Tracker App which helps us keep the cost of the Tracker App as low as possible. Advertisers and advertising networks use some of the information collected by the Tracker App, including, but not limited to, the unique identification ID of your mobile device and your mobile telephone number.

**What are my opt-out rights?**

You can opt-out of all information collections by uninstalling the Tracker App: You can stop all collection of information by the Tracker App easily by uninstalling it. 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. Please note that if you choose to uninstall the Tracker App, we will not be able to locate you via the Tracker App.

**Data Retention Policy, Managing Your Information**

We will retain User Provided data for as long as you use the Tracker App and for a reasonable time thereafter. We will retain Automatically Collected information in aggregate. Please note that some or all of the User Provided Data may be required in order for the Tracker App to function properly.



## **Children**

We do not use the Tracker App to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at via the Tracker App or at [info@tracker.co.za](mailto:info@tracker.co.za). We will delete such information from our system within a reasonable time.

## **Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Tracker App. Please be aware that, although we provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

## **Changes**

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

## **Your Consent**

By using the Tracker App, you are consenting to our processing of your information as set out in this Privacy Policy (as may be amended from time to time). "Processing" means using cookies on a computer/hand held device/mobile phone or using or touching information in any way, including but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in South Africa. If you reside outside South Africa your information will be transferred, processed and stored under South African privacy standards.

## **Copyright**

The copyright and all intellectual property rights of Tracker Guard and the Tracker App vest in Tracker Connect (Pty) Ltd.

## **Contact us**

If you have any questions regarding privacy while using the Tracker App, or have questions about our practices, please contact us via email at [info@tracker.co.za](mailto:info@tracker.co.za).