# **FLEETRAK Privacy Policy**

At FLEETRAK we value and respect the privacy of our customers. Therefore, our Privacy Policy establishes clear and transparent procedures for collecting and using information, and presents the approaches and principles used by FLEETRAK to ensure personal data protection.

We process personal information for certain legitimate business purposes which include, some or all, of the following:

- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of the customer.
- To identify and prevent fraud.
- To enhance the security of our networks and information systems.
- To better understand how people, interact with our social media and web sites.
- To provide postal communications which we think will be of benefit and interest to you.
- To determine the effectiveness of our promotional campaigns and our advertising.

Personal data are processed in accordance with the Regulation Cyber and Data Protection Act [Chapter 12:07], other relevant legislation, and instructions of supervising authorities.

## Who we are

Our website adress is: https://fleetrak.co.zw

Your personal data controller is:

FLEETRAK Telematics

723 Crocodile Road

Chiredzi

Zimbabwe

fleetrakzim@gmail.com Company code: 27522/2022 TIN Number: 2001542690

## What personal information we collect and why we do it

### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

**Location**: We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

**User Information:** Your name, which identifies you as a user in the FLEETRAK tracking Application

**Device information**: This can include IP address, microphone information, CPU status, memory status, battery status, system version, phone model, phone signal level, received signal strength indicator (RSSI), network type, user attributes and channel attributes.

**Call content:** Audio data generated during calls

**Call information:** Information relating to the date, time and duration of calls, as well as the name of the person that you contacted or the person that contacted you

#### **Contact forms**

At our website you have a possibility to contact us via contact form by sending a message. The data you provide (name, company, e-mail address, phone number, message) will be only used to react to your enquiry. Legal framework for processing this data – your consent.

#### Cookies

To ensure the functionalities of the website small data files called "cookies" are transferred to the hard drive of your device. The use of cookies is an industry standard.

Cookies are small data files used as unique identifiers. Cookies enable the website to "memorise" for a certain period of time your actions and preferences (e.g. user name, language, IP address, font size and other viewing options) and saves you from repeated entering the same information each time you visit or browse our website. Cookies also help to collect website statistics.

Cookies will be stored only upon your consent to be confirmed in the pop-out window, except for the strictly necessary and technical cookies used in order to provide a properly functioning website.

## Content uploaded from other websites, cookies of third parties

This website may contain the content uploaded from other websites (e.g. videos, pictures, texts, etc.) Viewing or engaging with such uploaded content in this website is equivalent to visiting those websites from which the content is uploaded.

These websites may collect data about you, use cookies, third-party tracking services, and monitor your actions with the uploaded content, also including the cases when you have established connections with the said websites (e.g. Youtube, Google, etc.).

#### Google maps

Cookies placed by Google maps are used to show a convenient map and specify the locations.

These cookies expire in 10 years.

Example of cookies: SID, SAPISID, APISID, SSID, HSID, NID, PREF

"Google" privacy policy here

#### Youtube

We embed videos from our official YouTube channel using Privacy-Enhanced mode.

In this mode tracking cookies can be set on your computer when you click on the YouTube video player; however, when embedded videos are viewed in Privacy-Enhanced mode, YouTube will not store personally-identifiable cookie information.

These cookies expire in 10 years.

Example of cookies: Visitor\_info1\_Live, Use\_Hitbox, SID, LOGIN\_INFO, use\_hotbox, PREF, SSID, HSID, watched\_video\_id\_list, \_\_utma, \_\_utmz, demographics, VISITOR\_INFO1\_LIVE

"Youtube" privacy policy here

### How can I control the cookie settings?

You can manage cookies by selecting the cookies to accept and the cookies to reject in the settings of your browser. You may reject cookies at any time by deleting cookies from the browser where they are set. The place for managing cookies depends on the browser you use. To learn more how to manage and delete cookies set in your browser please visit your browser's website or read a short instruction for the most popular browsers here: Chrome; Mozilla, Edge; Safari; Opera.

## **Use of Data**

We may also collect information that your browser sends whenever you visit our Service or when you access Service by or through any device ("Use of Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access Service with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

We use the collected data for various purposes:

- to provide and maintain our Service;
- to notify you about changes to our Service;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer support;
- to gather analysis or valuable information so that we can improve our Service;
- to monitor the usage of our Service;
- to detect, prevent and address technical issues;
- to fulfill any other purpose for which you provide it;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
- to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- in any other way we may describe when you provide the information;
- for any other purpose with your consent.

### **Retention of Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Zimbabwe and choose to provide information to us, please note that we transfer the data, including Personal Data, to Zimbabwe and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

FLEETRAK will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## Whom we share your data with

We may disclose personal information that we collect, or you provide: If requested by legal authorities. Other than them we will not disclose your data.

#### Disclosure for Law Enforcement.

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.

#### **Business Transaction.**

If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.

### Other cases. We may disclose your information also:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties we use to support our business;
- to fulfill the purpose for which you provide it;
- for the purpose of including your company's logo on our website;
- for any other purpose disclosed by us when you provide the information;

- with your consent in any other cases;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.
- website hosting service providers
- marketing service providers
- project development team

## **Security of Data**

The process of protecting data from unauthorized access and data corruption throughout its lifecycle. Data security includes data encryption, hashing, tokenization, and key management practices that protect data across all applications and platforms.

## What website security procedures we use

### The website uses Letsencrypt.org SSL Certificate

- Approved website identity (we visit the website of actual owner of the domain rather than are directed to hackers' fake server)
- Encrypted all between the server and the browser transmitted data (network hackers can no longer read them)...
- Guaranteed data integrity and originality (en-route routers cannot correct or censor the information transmitted)..

For more information: https://letsencrypt.org

#### Website administrator password security manual

It promotes everyone having access to the website to use strong passwords. Besides, it aims at complying with OWASP 10 security standard.

## Information on regulated activities

If you think that your right to privacy has been breached, you may lodge your complaint to POTRAZ located at **1008 Perfomance Close Mt Pleasant Business Park** P.O. Box MP843 Mount Pleasant Harare, Zimbabwe Tel.: +263 242 333032. Website: http://www.potraz.gov.zw, within 24 hours of becoming aware of it. If the breach is likely to pose a high risk to the rights and freedoms of individuals, those affected must also be informed within 72 hours.

## How to get to know about policy changes?

Major changes to fleetrak.co.zw Privacy and Cookies Policy will be posted to FLEETRAK website.

Updated at 29 - 10 - 2025