

# Netradyne Privacy Policy

Last Updated: 02/15/2023

## About Netradyne

Netradyne is a company headquartered in the United States. Netradyne's mission is to promote safe driving behaviors and improve road safety. This mission requires an in-depth understanding of a vehicle's driving environment, so our business customers use our Driver•i device that includes a number of sensors and up to 4 integrated cameras to record such environment. Some business customers may use additional services and accessories, including accessories that provide access to vehicle network data, the Driver•i App, or the Driver•i Hub-X that may enable capture of additional camera views. Netradyne's technology can assess distracted driving behaviors and traffic in and around the vehicle to identify risky distances, proactive responses, traffic violations, and other road events that are difficult to detect. These detections can then be used to correct unsafe driving actions and promote safer driving habits. You can find out more about us and our products and services [here](#).

Netradyne, Inc. (collectively "Netradyne" or "we," "us," or "our") respects your privacy and is committed to protecting it through our compliance with this Privacy Policy ("Policy").

When you access our Websites and engage with our Marketing Activities (as defined below), you acknowledge that you have read this Policy and understand its content.

Your continued use of our Websites and interactions with our Marketing Activities and any dispute over privacy is subject to this Policy and any applicable terms of use (including any applicable limitations on damages and the resolution of disputes).

We recommend that you read this Policy in full to ensure you are fully informed. However, to make it easier for you to review those parts of this Policy that are relevant to you, we have divided the document into sections.

If you are unable to access this Policy due to a disability or any physical or mental impairment, please contact us using the contact details in the "How to Contact Us" Section and we will arrange to supply you with the information you need in an alternative format that you can access. You can also access a printable version of this Policy [here](#).

## Scope of this Policy

For purposes of this Policy, "Personal Information" means any information that can identify you, directly or indirectly, that is protected as "personal information", "personally identifiable information" or "personal data" under applicable laws. Personal Information includes, among other things, your name, image, voice, e-mail address, telephone numbers, postal address, billing information, contact information, tracking and usage information about your location, demographics, internet connection, and your use of your device and the Internet.

### Driver.i device

For the vast majority of Personal Information processing conducted by Netradyne through the Driver•i device (or related services or accessories), Netradyne is acting as a data processor or service provider on behalf of its business customers, and such processing is carried out in compliance with our legal and contractual obligations with our business customers. One exception is our Training Data, described below and in the Safer Roads and Safer Driving sections. Our business customer is responsible for complying with laws that may require notice, disclosure or consent related to the transfer of Personal Information to Netradyne. Netradyne enters into agreements with our business customers that legally require

Netradyne to protect the Personal Information we receive or are directed to collect and use it only to provide our products and services to the business customer. For more detailed information, please reach out to the business customer directly. Netradyne is not responsible for the data protection practices of its business customers, which may differ from those set forth in this Policy.

## **Training Data**

A very small fraction of data collected through the Driver•i device (or related services and accessories) will enter Netradyne's Training Data for machine learning purposes. For such machine learning activities, and to the extent Netradyne is processing Personal Information, Netradyne is acting as the controller or business of the Personal Information. The Safer Roads and Safer Driving sections provide information specifically about how Netradyne collects and uses your data for training its machine learning models when your video footage is collected by our business customer's vehicles.

## **Websites and Marketing Activities**

This Policy applies (unless a different policy or notice is displayed) to the processing of Personal Information collected by Netradyne in the usual course of business, including when you: visit, interact with or use any of our websites (including <https://netradyne.com/>) ("Websites"); visit our social media pages, public forums (such as our blogs), visit our offices, submit a job application to Netradyne; receive online advertisements or communications from Netradyne, including emails, phone calls and texts; or register for, attend and/or otherwise take part in our events, tutorials, webinars or contests (we collectively refer to all of these activities as our "Marketing Activities" in this Policy).

## **Third party websites, products or services**

This Policy does not apply to websites, products, or services that display or link to different privacy statements or that are operated by companies other than Netradyne, or to business activities or practices of third parties.

The Websites and Marketing Activities may contain links to other web sites or resources not operated or controlled by Netradyne (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The privacy practices of these websites and services will be governed by their own policies. These links do not imply that Netradyne endorses or has reviewed the Third Party Sites.

We make no representation or warranty as to the privacy policies of any third parties, including the providers of third party applications. If you are submitting information to any such third party through our Website or Marketing Activities, you should review and understand that party's applicable policies, including their privacy policy, before providing your information to the third party. For example, it is possible that your payment information (such as credit card or debit card information) may be collected and stored by third party payment vendors. We suggest contacting those third parties directly for information on their privacy policies or if you have any questions or concerns about their privacy policies and practices.

## **Safer Roads**

We provide our products and services to business customers, but we do so with the individuals' rights and needs in mind. This section provides a brief overview, intended primarily for members of the public, about how Netradyne collects and uses your data when your video footage is collected by our business customer's vehicles. This section should be read in conjunction with the other relevant sections of the Privacy Policy, as applicable.

Driver•i-equipped vehicles may be marked with the following or similar stickers attached to the exterior of the business customer's vehicles:



### **I Saw a vehicle go by that directed me to this URL...**

Who are you?  
Netradyne, Inc.

What are you doing?  
Improving road safety. We analyze driving behavior to keep everyone safe on the road.

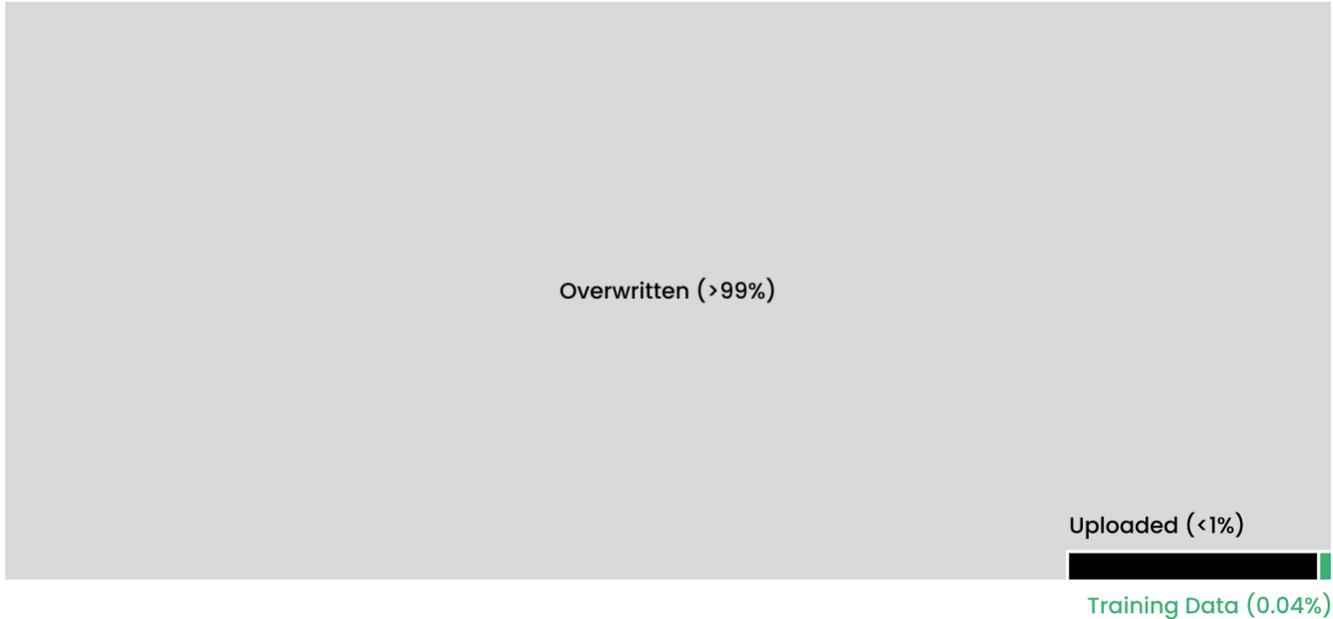
Why the stickers?  
Our system analyzes traffic events. That includes detecting other vehicles and people to determine if the driver is maintaining a safe distance. Our customers in Canada and Europe are contractually obligated to place stickers on their vehicles to notify the public that our system is in use and that images of people and other vehicles on the road might be collected and used.

Are you tracking me?  
No.

Are your customers tracking me?  
No. Customers typically access less than 1% of recorded video data. As an added protection, number plates and faces in the video data are blurred before they are shared with our customers in Canada or Europe.

Does Netradyne have any images of me?  
Possibly. We review and retain extremely small amounts of video data as Training Data to continually improve our ability to detect and classify traffic events and to locate number plates and faces so that they may be blurred in the videos that we provide to our customers.

How much data do you keep?  
Over 99% of video data never leaves the vehicle and is deleted within a few days. The remaining less than 1% of video data might be uploaded to a cloud server as part of the services that we provide to our customers. From there, we retain less than 0.04% of the recorded video as Training Data. That amount is represented by the green bar at the bottom right of this graph.



How can I find out if you have an image of me?

For members of the public, our ability to confirm that we have an image of you or to provide you with access to such an image will be limited by our need to protect the privacy of other individuals. In most cases, access is limited to video data that has already been uploaded and will only be fulfilled if Personal Information of other individuals can be adequately removed. Requests should include a date, time, location, and indicator of the vehicle such as number plate, together with information that can be used to authenticate that the requestor is a person who is visible in the image. Requests should be emailed to [privacy@netradyne.com](mailto:privacy@netradyne.com). For drivers, our ability to provide you with access to an image of you may be limited by our contractual obligations with our business customers, typically your employer. In addition, you may already have access to your images through your employer or through the Driver•i App. Contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) for more information.

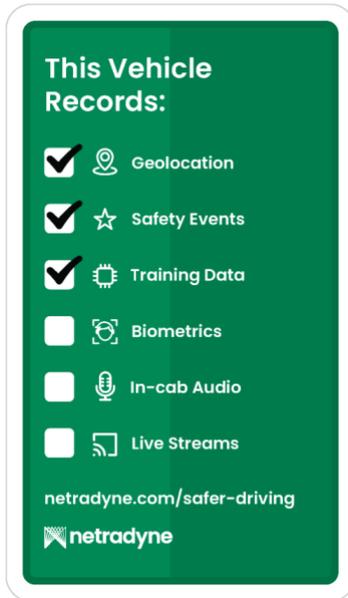
Can I request that you do not retain images of me?

You may request that Netradyne stop training its models based on images collected of you, subject to applicable laws. Contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) for more information.

## Safer Driving

We provide our products and services to business customers, but we do so with the individuals' rights and needs in mind. This section provides a brief overview, intended primarily for drivers and passengers of Driver•i equipped vehicles, about how Netradyne collects and uses your data when your video footage is collected by our business customer's vehicles. This section should be read in conjunction with the other relevant sections of the Privacy Policy, as applicable.

Driver•i-equipped vehicles may be marked with the following or similar stickers attached to the interior of the business customer's vehicles:



The checkmarks in this sticker indicate that Geolocation, Safety Events, and Training Data are being recorded and that Biometrics, In-Cab Audio, and Live Streams are disabled.

Geolocation data is transmitted to cloud servers to enable vehicle tracking and to enable and/or provide context to detected safety events.

Safety events are detected based on processing of video and sensor data on the Driver•i device. Inward camera video recordings are used to detect safety events such as distracted driving or wearing a seatbelt. Recordings of drivers, passengers, or other Personal Information (such as may be visible on name tags) may be contained in these inward camera video recordings. Outward camera video recordings are used to detect safety events such as coming to a complete stop at an applicable stop sign. Processing of outward camera data results in the detection of cars, motorcycles, bicycles, etc. with their individual position and movement in relation to the Driver•i-equipped vehicle as well as the position and movement of pedestrians. Recordings of individual road users, license plates or other Personal Information may be contained in these video recordings. Safety event data may be used by our customers for, among other reasons, driver commendation or training purposes, and for managing the relationship with the driver. Netradyne provides resources to help its business customers transform their safety program. See: <https://www.netradyne.com/blog/category/transparency>.

Training Data is selected from video recordings. In the later evaluation of the recordings, the video and sensor data are used to develop and improve the algorithms for the driving system. Only a small fraction of video data will enter Netradyne's machine learning databases as Training Data. Furthermore, the presence of Personal Information within the video data, such as discernible driver or passenger faces in inward camera video or discernible license plates or pedestrian faces in outward camera video, is incidental to the machine learning purposes; no biometric identifiers are derived from or used in conjunction with Training Data.

Training Data is entered into the machine learning databases for the purposes of (a) testing and training Netradyne's perception engine's ability to automatically detect pedestrians, drivers, and passengers, (b) to test and train Netradyne's perception engine on specific aspects of the visual scenes that Netradyne's camera systems encounter, and (c) develop, validate and refine the software that will operate on the Driver•i device. For example, Netradyne collects examples of images containing pedestrian detection failures so that we can train the perception engine. Over time, the perception engine will learn to automatically detect a pedestrian (as a category of data type) in images where it previously could not. It is rare that the images are sufficiently clear and close enough to a pedestrian to be readily identifiable. In the example image below, you may see the recordings of other vehicles and pedestrians in front of a Driver•i-equipped vehicle. They

are only recognized as “persons” or “cars” by the algorithm and are classified in such way. The images are not used to identify the unknown pedestrians, the different car models or their drivers. The example image also illustrates the license plate and pedestrian face blurring that is applied by Netradyne (by default in Canada and Europe) as part of its provision of services to its business customers.



To ensure accuracy of the Driver•i system for a broad range of drivers and road situations, Driver•i devices are configured to collect Training Data by default. On average, we retain less than 0.04% of recorded video data as Training Data. Video data is more likely to be selected as Training Data if customer or driver feedback or the result of a random audit indicates that Driver•i device processing was in error. For accuracy to improve for all drivers and in all road situations it is necessary to collect a diverse set of Training Data, and especially for the Training Data selection to emphasize videos or images corresponding to processing errors. Netradyne and its customers use this layered approach to human review, incorporating feedback made directly by customers or drivers together with objective, random audits of uploaded Safety Event videos, to monitor and improve the system’s accuracy. You may request that Netradyne stop training its models based on images collected of you, subject to applicable laws. If, as a driver, you choose to opt-out of Training Data, newly collected images collected during driving sessions associated with you will not be selected as Training Data. As a result, on-device processing may continue to make certain errors for longer than it would otherwise. Images of you that have already been selected as Training Data prior to your request may continue to be used as Training Data as the deidentification process and related privacy protections are designed such that Training Data images are effectively unsearchable. Safety event feedback submitted by drivers through the Driver•i App may be combined with Training Data, but will not include Personal Information, except as may be included in comments provided by the driver. Contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) for more information.

Biometrics are disabled by default. If enabled (with your prior consent when required by law), collection and use of biometrics is only applied to drivers based on certain cropped inward camera images, and only for the purpose of associating a driver with a vehicle for a driving session. Facial recognition technology is not applied to outward camera video or images. Drivers can go to <https://netradyne.com/biometric-data-privacy-policy/> for our privacy policy regarding the collection of biometric data.

Additional sensors and features, such as In-cab Audio and Live Streams, are disabled by default on Driver•i devices. Any legally required notification regarding In-cab Audio or Live Streams will be provided by our business customer, if applicable.

Combining Personal Information for valid business purposes. To the extent permitted by applicable law and our contractual obligations to our business customers, we may combine personal information, including information obtained from any of our business customer’s vehicles, for valid business purposes, such as defined in regulations adopted pursuant to paragraph (10 of subdivision (a) of Section 1798.185 of the California Privacy Rights Act. Valid business purposes include auditing, debugging, technological development and demonstration, and to improve, upgrade, or enhance the services or devices.

Deidentified Data. To the extent permitted by applicable law and our contractual obligations to our business customers, we may retain and use deidentified information, including information obtained from any of our vehicle devices, for product improvement and product development purposes, based on our public commitment to maintain and use the information in deidentified form and not to attempt to reidentify the information.

## Legal Basis for Processing Driver•i Data

Under European and UK data protection laws, the legal basis for the collection and processing of video recordings of the surroundings of Driver•i-equipped vehicles (including the recording of pedestrians and other drivers) and, if enabled, video recordings of the interior of Driver•i-equipped vehicles (including the recording of drivers and passengers) is Netradyne's legitimate interest to improve the accuracy and functionality of the Driver•i device to improve road and fleet safety and encourage safer driving. Under Canadian data protection laws, we collect and process these video recordings for the purposes described in this Statement based on your consent, which may be implied depending on the circumstances, or as otherwise permitted or required by law. Members of the Canadian public wishing to learn more are invited to contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com), or see the "How to Contact Us" section below. Data collected by the Driver•i-equipped vehicles is used by Netradyne to develop and validate the algorithms for different functions of safe driving.

In certain circumstances, our legal basis for the processing may be our legal obligations, for instance, to establish a defense in case of litigation or to comply with legal obligations, in particular with regulatory requirements.

## Personal Information We Collect from Websites and Marketing Activities

### Personal Information you provide to us:

Our Websites offer various ways to contact us, such as through form submissions or email to inquire about Netradyne and our products and services. For example, when expressing an interest in obtaining information, subscribing to marketing or otherwise contacting us, we will collect personal information from you. We may also collect information from you in person at a tradeshow or event or via a phone call with one of our sales representatives or if you visit our offices (where you may be required to register as a visitor and provide us with certain information).

### The Personal Information we collect may include:

- Business contact information (such as your name, email address, physical address, phone number, city).
- Professional information (such as your job title, institution or company).
- Nature and content of your communications. When you contact us or we contact you, we collect any information that you provide, including the contents of the messages or attachments you send us.
- Marketing information (such as your contact preferences).
- Applicant information if you apply for a job with Netradyne (such as your resume, desired pay, education and work history, whether you are over the age of 18, and visa status. You also may choose to provide your gender, ethnicity, veteran status, disability status, and links to your website, blog, portfolio, or LinkedIn profile).

- Online content (which includes Personal Information disclosed by you on message boards, chat features or blogs to which you are able to post information and materials, including third party services and platforms).

We may also record or monitor our telephone or other communications with you, to the extent permitted by applicable law.

Providing your Personal Information is optional, but it may be necessary in certain cases, such as for product registration, to access content such as whitepapers, or to activate or access an app. In such cases, if you do not provide your Personal Information, we may not be able to provide you with or respond to your request.

### **Personal Information we collect automatically:**

When you visit our Websites or interact with us for instance through our Marketing Activities, like most websites and companies, we use cookies and similar technologies such as web beacons, tags and JavaScript, alone or in conjunction with cookies, to automatically collect certain technical information from your browser or device. In some countries, including countries in the European Economic Area, Switzerland and the United Kingdom, this information is considered Personal Information under data protection laws. To the extent that this automatically-collected data includes, or is linked to, Personal Information, we will treat the data in accordance with this Policy.

### **The Personal Information we collect may include:**

- Device and traffic data – Information about your computer or device model, IP address, version of operating system, browser type, browser language, identity of carrier and manufacturer, radio type (such as 4G), preferences and settings (such as preferred language), application installations, device identifiers, advertising identifiers, request information (speed, frequency, the site from which you linked to us) (“referring page”), date and time of access, access times, the name of the website you choose to visit immediately after ours (called the “exit page”), information about other websites you have recently visited, and push notification tokens.
- Usage data – Information about how you interact with our emails, Websites and other online forums (such as the pages and files viewed, searches, operating system and system configuration information and date/time stamps associated with your usage).
- Location data – Information about your device’s location, which can be either precise or imprecise. How much of this information we collect depends on the type and settings of the device you use. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects or features.
- Inferences – We infer new information about you from data we collect, including using automated means to generate information about your likely preferences, your service and product needs or other characteristics. For example, we infer your city, state, and country location based on your IP address.

### **Cookies and Similar Technologies:**

Cookies are small text files placed on your device to store information that can be recalled by a web server in the domain that placed the cookie. Our Websites make use of first or third party cookies (whether session or persistent cookies) and similar technologies, for such things as session management, account access/ authentication, to recognize returning users, for storing and honoring user’s preferences and settings, combating fraud, maintaining and monitoring the infrastructure of our Websites, ensuring security protections, analyzing performance and other analytics purposes, and fulfilling other legitimate purposes as further described in this Policy (such as fixing issues with and improving our Websites and related

user experience). We also use analytics cookies to better understand how our Websites are being used by tracking how you interact with the Websites and where you click.

You can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

**Google Analytics:** We use cookies served by Google Analytics to collect limited information directly from end-user browsers to enable us to better understand your use of the Websites, including making use of the demographics and interests reports services of Google Analytics. Further information on how Google collects and uses this information can be found at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt-out of all Google supported analytics within the Websites by visiting <https://tools.google.com/dlpage/gaoptout>.

**ZoomInfo:** We use cookies served by ZoomInfo to collect limited information directly from end-user browsers to enable us to better understand your use of the Websites, including to target audience groups. Further information on how ZoomInfo collects and uses this information can be found at <https://www.zoominfo.com/about-zoominfo/privacy-policy>. You can update your own professional ZoomInfo profile by visiting <https://www.zoominfo.com/update/profile>. You can remove your ZoomInfo profile completely by visiting <https://www.zoominfo.com/update/remove>.

**LinkedIn:** We use cookies served by LinkedIn to collect limited information directly from end-user browsers to enable us to better understand your use of the Websites, including to target audience groups. Further information on how LinkedIn collects and uses this information can be found at <https://www.linkedin.com/legal/privacy-policy>. You can opt-out by visiting <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>. LinkedIn members can adjust their advertising settings by visiting <https://www.linkedin.com/psettings/advertising-data>.

For further information, please review our [Cookie Policy](#).

### **Collection of Personal Information from or through social media sites:**

When you interact with any Netradyne page or account on a social media platform, such as Facebook, Twitter, Google+, Tumblr, LinkedIn, YouTube, or Pinterest, we may collect the Personal Information that you make available to us on that page or account including your account ID or “handle.” The respective social media network may receive information showing that you have visited our Website. If you are logged in to your social media account, it is possible that the respective social media network can link your visit to our Website with your social media profile. Your interactions with these social media features are governed by the privacy policies of the companies providing the relevant social media features. You should review and consider adjusting your privacy settings on third-party websites and services before engaging. Do not provide us with any sensitive personal information through these platforms. We are not responsible for the data protection and use practices of these third-party platforms. Please see their privacy policies to learn how they use your information.

### **Information we collect from other sources:**

In order to enhance our ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, financial service providers, affiliate programs, data providers, Social Media Features as noted above, as well as from other third parties.

This information may include mailing addresses, job titles, email addresses, phone numbers, financial information (such as payment, transaction and fraud detection information), intent information (or user behavior information), market segment, IP addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising, event promotion and optimizing our Marketing Activities. We may combine this Personal Information with other information we collect about you through our Marketing Activities.

## How We Use Personal Information from Websites and Marketing Activities and Legal Basis

We use and process the Personal Information identified above for the purposes and on the legal bases identified below.

If you are located in the European Economic Area, the United Kingdom or Switzerland, Netradyne, Inc. is the data controller of your Personal Information. Our legal basis for collecting and using the Personal Information will depend on the Personal Information concerned and the specific context in which we collect it. However, we will normally collect Personal Information only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect and retain your Personal Information.

- Developing and improving our Marketing Activities. We are always working to improve your experience and provide you with new and helpful features. We process your Personal Information to analyze trends and to track your usage of and interactions with our Marketing Activities to the extent it is necessary for our legitimate interest in developing and improving our Marketing Activities and providing you with more relevant content and service offerings, or where we seek your valid consent.
- Identifying Customer opportunities. In the US only, we process your Personal Information to assess new potential customer opportunities to the extent that it is in our legitimate interest to ensure that we are meeting the demands of our customers and their users' experiences.
- Assessing and improving your user experience. In the US only, we process device and usage data as described above which in some cases may be associated with your Personal Information, in order to analyze trends in order to assess and improve the overall user experience to the extent it is necessary for our legitimate interest in developing and improving our Marketing Activities, or where we seek your valid consent.
- Sending marketing communications. We will process your Personal Information to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS, or push notifications) about Netradyne when this is in accordance with your marketing preferences, including information about our products and services, promotions or events as necessary for our legitimate interest in conducting direct marketing or to the extent you have provided your prior consent (please see the ["Your Privacy Rights and Choices"](#) section below, to learn how you can control the processing of your Personal Information by Netradyne for marketing purposes).
- Displaying personalized advertisements and content. We process your Personal Information to conduct marketing research, advertise to you, provide personalized information about us on and off our Websites and to provide other personalized content based upon your activities and interests to the extent it is necessary for our legitimate interest in supporting our Marketing Activities or, where necessary, to the extent you have provided your prior consent (please see the ["Your Privacy Rights"](#) section, below, to learn how you can control how the processing of your Personal Information for personalized advertising purposes).
- Managing event registrations and attendance. In the US only, we process your Personal Information to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you, to perform our contract with you.
- Reviewing compliance with applicable terms. We process your Personal Information to review compliance with our contract with you or your organization (where applicable) to the extent that it is in our legitimate interest to ensure adherence to the relevant terms.

- Registering office visitors. We process your Personal Information for security reasons, to register visitors to our offices in the US and India and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices and our confidential information against unauthorized access.
- Processing job applications. We process your Personal Information if you apply for a job with Netradyne, to evaluate your application and make hiring decisions, communicate with you and inform you of current and future career opportunities (unless you tell us that you do not want us to keep your details for such purposes), manage and improve our recruiting and hiring processes, or to conduct reference and background checks where required or permitted by applicable local law. We perform this processing to the extent that it is necessary to comply with our legal obligations, for our legitimate interest in assessing the suitability of our candidates and managing our recruiting process, or, where required by applicable law, with your consent. We are not currently soliciting or accepting job applications directly from residents of the EEA, UK or Switzerland. These residents please email [hr@netradyne.com](mailto:hr@netradyne.com) for more information.
- Complying with legal obligations. We process your Personal Information when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Information to protect our rights or is necessary for our legitimate interest in protecting against misuse or abuse of our Websites, protecting personal property or safety, pursuing remedies available to us and limiting our damages, complying with judicial proceedings, court orders or legal processes or to respond to lawful requests. Where we need to collect and process Personal Information by law, or under a contract we have entered into with you, and you fail to provide the required Personal Information when requested, we may not be able to perform our contract with you.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products and features, enhancing, improving or modifying our products and services, identifying usage trends and expanding our business activities in reliance on our legitimate interests.

If you have questions about the legal basis for processing or want to find out more, please contact us using the details at the end of this Policy in the Section “[How to Contact Us](#)” below.

## How We Disclose your Personal Information

We do not sell or share your Personal Information with third parties except as outlined below.

### Affiliated and Related Entities

We may disclose your Personal Information with our affiliates, subsidiaries or related entities of Netradyne. We require those entities to use your Personal Information solely for the purposes and in accordance with this Policy.

### Third-Party Agents and Service Providers

We have contractors, third-party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as hosting, billing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services.

## **Analytics and Advertising Partners**

We may partner with third party analytics and advertising networks, exchanges and social media platforms (like Facebook) to (i) to better understand how you engage with our Websites and Marketing Activities by tracking how you interact and where you click, (ii) display advertising on and off our Website or to manage and service advertising on other sites and we may share Personal Information with them for this purpose. Please see more information in our [Cookie Policy](#) for further information, including information about how you can turn off tracking technologies.

## **Compliance with Laws and Vital Interests**

We may disclose your Personal Information if required to do so by any competent law enforcement body, regulatory, government agency, court or other third-party where we believe disclosure is necessary to comply with applicable law or regulation, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies in accordance with applicable laws.

We also reserve the right to disclose your Personal Information that we believe, in good faith and in accordance with applicable laws, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of our Driver•i device and related accessories and any facilities or equipment used to make our Driver•i device or related accessories available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

## **Buyer or Successor**

We may disclose or transfer Personal Information in connection with, or during negotiations of, an assignment, merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Netradyne's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Netradyne covered by this Policy is among the assets transferred. Under such circumstances, we would inform the buyer it must use your Personal Information only for the purposes disclosed in this Policy, as it may be amended from time to time.

## **Consent**

We may disclose any Personal Information with your consent, including to fulfil the purpose for which you provided it. You may revoke your consent at any time by contacting us at [privacy@netradyne.com](mailto:privacy@netradyne.com).

## **Aggregated or Anonymized Data**

We may disclose information, including information obtained from any of our business customer's vehicles (subject to our contractual and legal obligations), that has been aggregated or anonymized so that it can no longer identify any individual directly or indirectly, in accordance with applicable law.

## **How Long We Store Your Personal Information**

We retain the Personal Information we collect from you for as long as necessary for the intended purposes.

We determine the appropriate retention period for Personal Information on the basis of the amount, nature and sensitivity of your Personal Information processed, the potential risk of harm from unauthorized use or disclosure of your

Personal Information and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

When we have no ongoing legitimate interest or legal obligation to process your Personal Information, we will either delete or anonymize it, or deidentify it where permitted by law, or, if this is not possible (for example, because your Personal Information has been stored in backup archives) then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

For further information, please contact us (see the “[How to Contact Us](#)” section below).

## **How We Protect Your Personal Information**

We take the security of your Personal Information very seriously. We use reasonable and appropriate administrative, physical, and technical safeguards to secure the Personal Information we process. Please understand, however, that despite these safeguards and our additional efforts to secure your Personal Information, no electronic transmission of data over the Internet or any other network or technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third-parties will not be able to defeat our security, and improperly collect, access, steal, or modify your Personal Information and therefore any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures.

The security of your use of the Websites and engagement with our Marketing Activities relies on your protection of your devices and login credentials (as applicable). You may not share your instance with anyone outside of your organization (as applicable). If you believe that an unauthorized access to your instance has occurred, or you think there’s any security issue or risk, please report it immediately at [privacy@netradyne.com](mailto:privacy@netradyne.com). Any email or other communication purporting to be from Netradyne requesting your password or asking you to provide sensitive account information via email, should be treated as unauthorized and suspicious and should be reported to us immediately by emailing [privacy@netradyne.com](mailto:privacy@netradyne.com). You must promptly notify us if you become aware that any information provided by or submitted to Netradyne is lost, stolen, or used without permission.

## **International Transfers**

We may store Personal Information outside the jurisdiction where you reside, in which case it may be subject to the law of that foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction. We use reasonable safeguards to ensure your Personal Information is protected wherever it is used or stored, including when processing is carried out by a service provider.

In the event that we transfer Personal Information from the UK or the European Economic Area (“EEA”) to countries which have not been determined to have an adequate level of data protection, we use a variety of legal mechanisms to ensure adequate level of protection, including entering into the UK or EEA Standard Contractual Clauses, with appropriate technical and organizational security measures to ensure that your Personal Information is processed in accordance with applicable data protection standards.

For further information, please contact us (see the “[How to Contact Us](#)” section below).

## Additional Disclosures for California Consumers

### California Privacy Rights Act

This notice applies only if you are a resident of California (“California Consumer”) and have provided Personal Information to Netradyne that is subject to the California Privacy Rights Act (“CPRA”). We typically collect Personal Information in the capacity of a service provider to our business customers, who are responsible for providing notice to their employees and contractors and complying with CPRA requirements.

Throughout this Policy, we discuss in detail the specific pieces of Personal Information we collect from you or your device and discuss how we use and share such information when we act as a business (as this term is defined in the CPRA). As described in detail in the [Safer Roads](#) and [Safer Driving](#) sections and [The Personal Information We Collect from Websites and Marketing Activities and Legal Basis](#) above, during the past 12 months, we have collected Personal Information including: (a) identifiers, such as name and contact information; (b) biometric information (see our [Biometric Data Privacy Policy](#) for more information); (c) Internet or other electronic network activity information; (d) geolocation data; (e) Audio, electronic, visual, thermal, olfactory, or similar information; (f) professional or employment-related information (from job applicants and from business customers regarding their employees and contractors); and (g) education information (from job applicants).

The sources from which we collect Personal Information are described in the [Safer Roads](#) and [Safer Driving](#) sections and [The Personal Information We Collect from Websites and Marketing Activities and Legal Basis](#). The business and commercial purposes for which we collect this information are described in the [Safer Roads](#) and [Safer Driving](#) sections and [How We Use Your Personal Information from Websites and Marketing Activities and Legal Basis](#). The categories of third parties to whom we “disclose” this information for a business purpose are described in [How We Disclose Your Personal Information](#) and International Transfers.

Netradyne does not sell your Personal Information as the terms “sale” or “sell” are traditionally understood (i.e., for money). However, making a California resident’s Personal Information (including IP addresses and cookies IDs) available to third parties as described above may broadly be considered a “sale” under the CPRA, given its broad definition of “sale.” The definition is broad enough to include the sharing of Personal Information with third parties for any form of benefit, even if no money changes hands. According to this broad definition, in the year before this section was last updated, we have shared the following categories of Personal Information with third parties: identifiers (like your IP address) and other electronic network activity (such as browsing history) with our analytics and advertising partners. In this circumstance we rely on the CPRA marketing exemption allowing us to (i) store marketing information on third party systems, provided applicable terms are in place with our service provider; (ii) provide opt-outs from marketing communications, as opposed to requiring an opt-in; and (iii) follow applicable cookie consents on our website.

### California Do Not Track Notice

California law requires us to let you know how we respond to web browser Do Not Track (DNT) signals. Because there currently isn’t an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

### California’s Shine the Light law

If you are a California resident, you are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. To request the above information, please e-mail us at [privacy@netradyne.com](mailto:privacy@netradyne.com) or write to us at [privacy@netradyne.com](mailto:privacy@netradyne.com) with a reference to “CA Disclosure Information” and include your name, street

address, city, state, and ZIP code. Please note that Netradyne is not required to respond to requests made by means other than through the provided e-mail address or mail address.

## Your Privacy Rights and Choices

To the extent required by applicable law, Netradyne provides ways for you to access and delete your Personal Information as well as exercise other rights that give you certain control over your Personal Information.

### A. All Individuals

- Email Subscriptions. You can always unsubscribe from our commercial or promotional emails by clicking unsubscribe in those messages. We make every effort to promptly process all unsubscribe requests. If you choose to no longer receive marketing information, we may still communicate with you regarding such things as your security updates, product functionality, responses to service requests, or for other transactional, non-marketing related reasons. If have any concerns about our use of your Personal Information, send us a message at [privacy@netradyne.com](mailto:privacy@netradyne.com).
- Location information. You can prevent your device from sharing location information through your device's system settings.
- You may exercise choice regarding the use of cookies from Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

### B. Your EEA, UK, Switzerland and Canada Rights

Individuals located in the EEA, UK and Switzerland are generally entitled to claim certain data protection rights from data controllers, including the following:

- Access to or deletion of the Personal Information.
- Object to processing or request the restriction of the processing of the Personal Information.
- Complain to a data protection authority about the collection and use of the Personal Information.

Individuals located in Canada may have a right to access and rectify Personal Information that is no longer accurate, up-to-date or complete, subject to certain exceptions. Canadian residents may also have the right to withdraw consent at any time, subject to reasonable prior notice and applicable legal or contractual requirements.

Netradyne does not engage in any automated individual decision-making with your Personal Information.

To exercise your rights before Netradyne please email us at [privacy@netradyne.com](mailto:privacy@netradyne.com) or [dpo@netradyne.com](mailto:dpo@netradyne.com) (to contact our DPO) or see the "How to Contact Us" section below for further contact details (including our EEA and UK representative's contact details).

If you wish to complain to a data protection authority about the collection and use of the Personal Information, please contact your local data protection authority. Contact details for data protection authorities in EEA and UK are available [here](#). In Canada, the federal regulator can be found at [www.priv.gc.ca](http://www.priv.gc.ca). The British Columbia regulator can be found at <https://www.oipc.bc.ca>. The Alberta regulator can be found at <https://www.oipc.ab.ca>. The Quebec regulator can be found at <https://www.cai.gouv.qc.ca>.

### C. Your California Privacy Rights (California Residents)

This section applies only to California consumers. The CPRA provides some California residents with the additional rights listed below. To exercise these rights, please reach out to us at [privacy@netradyne.com](mailto:privacy@netradyne.com) with your request.

- Right to Know. You have the right to request access to, or a copy of the Personal Information we have collected, used, disclosed or sold about you over the past 12 months, including:
  - The categories and specific pieces of your Personal Information that we've collected, used, disclosed and sold about you;
  - The categories of sources from which we collected your Personal Information;
  - The business or commercial purposes for which we collected or sold your Personal Information; and
  - The categories of third parties with which we shared your Personal Information.
- You can submit a request to us for the following additional information:
  - The The categories of third parties to whom we've sold Personal Information, and the category or categories of Personal Information sold to each; and
  - The categories of third parties to whom we've disclosed Personal Information, and the category or categories of Personal Information disclosed to each.
- Right to Delete. You can request that we delete the Personal Information we have collected about you, subject to certain limitations under applicable law.
- Right to Delete. You can request that we delete the Personal Information we have collected about you, subject to certain limitations under applicable law.
- Right to Opt-Out of the Sale. You have the right to request that we not sell your Personal Information. Netradyne does not sell information as the terms "sale" or "sell" are traditionally understood (i.e., for money). However, making a California resident's Personal Information (including IP addresses and cookies IDs) available to third parties as described above may broadly be considered a "sale" under the CPRA, given its broad definition of "sale." The definition is broad enough to include the sharing of Personal Information with third parties for any form of benefit, even if no money changes hands. As discussed in this Privacy Policy, our analytics and advertising partners may collect your Personal Information such as identifiers (like your IP address) and other electronic network activity (such as browsing history) and may further share your information to provide similar analytics and advertising services to their other customers. You can request to opt out of such "sale" of your personal information by visiting our [Cookie Policy](#) and following its instructions. You can also opt out of such "sale" by e-mailing us at [privacy@netradyne.com](mailto:privacy@netradyne.com).
- Other Rights. You can request certain information about our disclosure of Personal Information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. You also have the right not to be discriminated against for exercising your rights under California law.

If you are a California resident seeking to exercise your CPRA rights, or if you are an authorized agent wishing to exercise CPRA rights on behalf of someone else, please contact us via email at [privacy@netradyne.com](mailto:privacy@netradyne.com). Please include your full name and email address along with why you are writing so that we can process your request in a timely manner.

Please note that to protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent (as applicable) have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your personal information.

As noted above, if your request concerns Personal Information collected in our capacity as a service provider to a business customer, we are not responsible for responding to the request and may send the request to the customer for a response.

## Children's Personal Information

Netradyne does not knowingly collect Personal Information from children under 16 years of age in a manner that is not permitted by applicable laws. If you are under 16 years of age, you should not provide Personal Information to Netradyne without providing us with consent from your parents or legal guardians. If Netradyne discovers that a child under the age of 16 has provided Netradyne with Personal Information and we do not have parental consent, Netradyne will immediately delete that child's information. If you believe we might have information from or about a child under 16, please contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) or send us a letter to the mailing address in the "How to Contact Us" Section below.

We do not knowingly "sell," as that term is defined under the CPRA, the personal information of minors under 16 years old who are California residents.

If you wish to make a request regarding your Personal Information, please contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com). If we have collected Personal Information on behalf of your employer or contractor, we will forward the request to your employer or contractor for a response. Otherwise, we will respond to your request to the extent required by applicable law.

## Changes to this Policy

Our business may change from time to time. As a result, at times it may be necessary for Netradyne to make changes to this Policy. Netradyne reserves the right to update or modify this Policy at any time and from time to time without prior notice, but only to the extent permitted by applicable law. Please review this Policy periodically, and especially before you use our Website or engage with our Marketing Activities. This Policy was last updated on the date indicated above. Your continued use of the Website and/or engagement with our Marketing Activities after any changes or revisions to this Policy shall indicate your agreement with the terms of such revised Policy. We encourage you to review this Policy frequently to be informed of how Netradyne is protecting your Personal Information.

## How to Contact Us

If you have any questions or concerns about this Policy or our privacy practices, including if you need to access this Policy in an alternative format, or if you wish to lodge a complaint about our privacy practices, please contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) or by mail at: Netradyne, Inc., 9171 Towne Centre Drive, Suite 110, San Diego, CA, 92122, USA.

Our Data Protection Officer is also available to help you understand the measures we take to ensure we process your Personal Information appropriately. To contact our Data Protection Officer, please email: [dpo@netradyne.com](mailto:dpo@netradyne.com). Because email communications are not always secure, please do not include sensitive information in your emails to us.

Our EEA representative may be reached by contacting:

- Email: [netradyne-privacy@lionheartsquared.eu](mailto:netradyne-privacy@lionheartsquared.eu)
- Post: Lionheart Squared (Europe) Limited (FAO Netradyne), 2 Pembroke House, Upper Pembroke Street 28-32, Dublin, D02EK84, Ireland

Our UK representative may be reached by contacting:

- Email: [netradyne-privacy@lionheartsquared.eu](mailto:netradyne-privacy@lionheartsquared.eu)
- Post: Lionheart Squared (Europe) Limited (FAO Netradyne), 17 Glasshouse Studios, Fryern Court Road, Fordingbridge, Hampshire, SP6 1QX, United Kingdom

# Cookies Policy

**Last Updated: 04/25/2022**

Like most companies, Netradyne uses automatic data collection tools, such as cookies, web beacons, and other device identification technologies, to operate our website and conduct our marketing activities. We use these tools to understand how you use our services and website, for advertising purposes, and to discover what is useful to our users.

This Cookies Policy ("Policy") explains how we use cookies when:

- You visit our website that links to this Cookie Notice (such as <https://www.netradyne.com>)
- Interact with any Netradyne online advertising or marketing emails; or

This Policy applies to all Netradyne users and to all Netradyne platforms and services, including our apps, websites, features, and other services. When we talk about "Netradyne," "we," "our," or "us," in this Policy, we are referring to Netradyne, Inc. and its group companies.

Some cookies that we use at Netradyne will collect personal information about you or information that becomes personal information if we combine it with other data. Any personal information that we collect will be used in accordance with our Privacy Policy.

## What are Cookies?

We use "cookies," which are small text files that are stored on your computer or equipment when you visit certain online pages. Cookies record your preferences and actions. We may also use cookies to monitor traffic, improve our services and website and make it easier and/or relevant for your use.

There are different types of cookies that vary by who sets them and for how long they endure, for example:

- First-party cookies are those that are set directly by Netradyne;
- Third-party cookies are set on our behalf, for example, by advertisers and data analytics companies;
- Session cookies only last only as long as your browser is open and are deleted automatically once you close your browser;
- Persistent cookies survive after your browser is closed, allowing for the recognition of your device when you open your browser and browse the Internet again.

## What are Cookies used for?

When you visit or interact with our website and services, we use first- and third-party cookies for a variety of purposes:

**Necessary Cookies.** Some cookies are required for technical reasons in order for our website and app to operate, and we refer to these as "necessary" cookies.

**Functional Cookies.** Cookies enable us to track how our users and prospects use and interact with our website and app, or other services. This allows us for instance to enhance and tailor the user experience. In the event we allow you to create an account, we use cookies to remind us who you are and to find your account information so you do not need to log in at

every visit. This helps us to provide you with service tailored to your specific needs and interests. A cookie is created when you register. We refer to these as “functional” cookies.

**Advertising Cookies.** We use cookies to let us know how well our online advertising works. These cookies allow us to deliver more targeted online advertising and marketing campaigns. They perform functions like preventing the same advertisement from continuously reappearing, ensuring that advertisements are properly displayed and, in some cases, selecting advertisements that are based on your interests. Third parties may serve cookies on your computer or mobile device to serve advertising through our website. These companies may use information about your visits to our website and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details or other personally identifying details unless you choose to provide these.

**Analytical Cookies.** Cookies also enable us to conduct analytics about online campaigns we are running as well as the usage and performance of our website and app. [In addition to other third party cookies, we use Google Analytics to collect limited data directly from user's browsers to enable us to better understand your use of our website in order to diagnose and improve the services and to fix issues. Further information on how Google collects and uses this data can be found here: <https://developers.google.com/analytics/resources/concepts/gaConceptsTrackingOverview>]

## What About Other Tracking Technologies, like Web Beacons?

We collect information using web beacons (also referred to as gifs and pixels), alone or in conjunction with cookies. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website or service tied to the web beacon, and a description of a website or service tied to the web beacon. For example, we or our marketing partners, may place web beacons in marketing emails that notify us or our partner when you click on a link in the email that directs you to our website. We use web beacons to understand usage and marketing campaign effectiveness, and to operate and improve our website, services, and email communications.

## Types of Tracking Technologies We Use and Why

The specific types of first and third party tracking technologies we use and the purposes they perform are described in the tables below. Please be aware that the cookies we use may depend on the features you are using and the device, browser or operating system you are using. We use both “session” cookies and “persistent” cookies.

- You can accept or decline cookies. Most web browsers automatically accept cookies, but, if you prefer, you can usually modify your browser setting to decline cookies. If you delete your cookies or if you set your web browser to decline cookies, some features may not work or may not work as designed. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## First-party (set by Netradyne):

### Necessary cookies

Cookie Name	Purpose	Duration
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cookielawinfo- checkbox- advertisement	Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	1 year
cookielawinfo- checkbox-analytics	Used to detect if the visitor has accepted the statistics category in the cookie banner. This cookie is necessary for GDPR- compliance of the website.	1 year
cookielawinfo- checkbox-functional	Determines whether the user has accepted the cookie consent box.	1 year
cookielawinfo- checkbox-necessary	Determines whether the user has accepted the cookie consent box.	1 year
cookielawinfo- checkbox- performance	Stores the user's cookie consent state for the current domain	1 year

### Functional cookies

Cookie Name	Purpose	Duration
<none>		

### Advertising cookies

Cookie Name	Purpose	Duration
_ccmsi	Used to track which users have shown interest in what job postings. The cookie ensures that the most relevant job postings are shown to the specific user.	Persistent
_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months
_gaexp	This cookie is used by Google Analytics to determine if the visitor is involved in their marketing experiments.	3 months
_gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	3 months
_hjRecordingEnable d	This cookie is used to identify the visitor and optimize ad-relevance by collecting visitor data from multiple websites – this exchange of visitor data is normally provided by a third-party data-center or ad-exchange.	Session

_uetsid	Collects data on visitor behaviour from multiple websites, in order to present more relevant advertisement – This also allows the website to limit the number of times that they are shown the same advertisement.	1 day
_uetsid	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor’s preferences.	Persistent
_uetsid_exp	Contains the expiry-date from the cookie with corresponding name.	Persistent
_uetvid	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor’s preferences.	1 year
_uetvid	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor’s preferences.	Persistent
_uetvid_exp	Contains the expiry-date for teh cookie with corresponding name	Persistent
Visitor_id#	Used in context with Account-Based-Marketing (ABM). The cookie registers data such as IP-addresses, time spent on the website and page requests for the visit. This is used for retargeting of multiple users rooting from the same IP-addresses. ABM usually facilitates B2B marketing purposes.	10 years
Visitor_id#	Used in context with Account-Based-Marketing (ABM). The cookie registers data such as IP-addresses, time spent on the website and page requests for the visit. This is used for retargeting of multiple users rooting from the same IP-addresses. ABM usually facilitates B2B marketing purposes.	10 years

### Analytical cookies

Cookie Name	Purpose	Duration
_cclk	Collects data on the user’s navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner.	1 year
_clsk	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	1 day

_cltk	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Session
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years
_ga_#	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit.	2 years
_gat	Used by Google Analytics to throttle request rate	1 day
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day
_hjAbsoluteSessionInProgress	This cookie is used to count how many times a website has been visited by different visitors - this is done by assigning the visitor an ID, so the visitor does not get registered twice.	1 day
_hjFirstSeen	This cookie is used to determine if the visitor has visited the website before, or if it is a new visitor on the website.	1 day
_hjIncludedInPageviewSample	Used to detect whether the user navigation and interactions are included in the website's data analytics.	1 day
_hjIncludedInSessionSample	Registers data on visitors' website-behaviour. This is used for internal analysis and website optimization.	1 day
_hjRecordingLastActivity	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	Session
_hjSession_#	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read.	1 day
_hjSessionUser_#	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read.	1 year
_hjTLDTTest	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Session

_omappvp	This cookie is used to determine if the visitor has visited the website before, or if it is a new visitor on the website.	11 years
hjViewportId	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	Session
omVisitsFirst	This cookie is used to count how many times a website has been visited by different visitors - this is done by assigning the visitor an ID, so the visitor does not get registered twice.	Persistent

## Third-party cookies:

### Necessary cookies

Third Party Name	Cookie Name	Purpose	Duration
linkedin.com	li_gc	Stores the user's cookie consent state for the current domain	2 years
doubleclick.net	test_cookie	Used to check if the user's browser supports cookies	1 day
ws.zoominfo.com	visitorId	Preserves users states across page requests	1 year

### Functional cookies

Third Party Name	Cookie Name	Purpose	Duration
ads.linkedin.com	lang	Remembers the user's selected language version of a website	Session

### Advertising cookies

Third Party Name	Cookie Name	Purpose	Duration
google.com	ads/ga- audiences	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session

c.clarity.ms	ANONCHK	Registers data on visitors from multiple visits and on multiple websites. This information is used to measure the efficiency of advertisement on websites.	1 day
Linkedin.com	bcookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	2 years
Linkedin.com	bscookie	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	2 years
Linkedin.com	lang	Set by LinkedIn when a web page contains an embedded "Follow us" panel.	Session
Linkedin.com	lidc	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	1 day
Pardot.com	Lpv#	Used in context with behavioral tracking by the website. The cookie registers the user's behavior and navigation across multiple websites and ensures that no tracking errors occur when the user has multiple browser-tabs open.	1 day
t.co	Muc_ads	Collects data on user behavior and interaction in order to optimize the website and make advertisement on the website more relevant	2 years
Bing.com	MUID	Used widely by Microsoft as a unique user ID. The cookie enables user tracking by synchronising the ID across many Microsoft domains.	1 year
Clarity.ms	MUID	Used widely by Microsoft as a unique user ID. The cookie enables user tracking by synchronising the ID across many Microsoft domains.	1 year
Google.com	Pagead/1p- user-list/#	Tracks if the user has shown interest in specific	Session

		products or events across multiple websites and detects how the user navigates between sites. This is used for easurement of advertisement efforts and facilitates payment of referral-fees between websites.	
c.clarity.ms	SM	Registers a unique ID that identifies the user's device during return visits across websites that use the same ad network. The ID is used to allow targeted ads.	Session
Bing.com	SRM_B	Tracks the user's interaction with the website's search- bar-function. This data can be used to present the user with relevant products or services	1 year
Tribl.io	Ti_	Used in context with Account- Based-Marketing (ABM). The cookie registers data such as IP-addresses, time spent on the website and page requests for the visit. This is used for retargeting of multiple users footing from the same IP-addresses. ABM usually facilitates B2B marketing purposes.	2 years
Facebook.com	tr	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	Session
Linkedin.com	UserMatchHist ory	Ensures visitor browsing-security by preventing cross- site request forgery. This cookie is necessary for the security of the website and visitor.	30 days
Pardot.com	Visitor_id#	Used in context with Account- Based-Marketing (ABM). The cookie registers data such as IP-addresses, time spent on the website and page requests for the visit. This is used for	10 years

		retargeting of multiple users footing from the same IP-addresses. ABM usually facilitates B2B marketing purposes.	
Pardot.com	Visitor_id#- hash	Used to encrypt and contain visitor data. This is necessary for the security of the user data.	10 years

### Analytical cookies

Third Party Name	Cookie Name	Purpose	Duration
linkedin.com	AnalyticsSync History	Used in connection with data- synchronization with third- party analysis service.	30 days
c.gif	c.clarity.ms	Collects data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner	Session
collect	google- analytics.com	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across de vices and marketing channels.	Session
twitter.com	personalization_id	This cookie is set by Twitter - The cookie allows the visitor to share content from the website onto their Twitter profile.	2 years

## How You Can Manage Cookies

You have rights and controls when it comes to managing cookies. Some cookies are necessary and we cannot provide our service to you without them, but there are others that can be turned off. Please note that turning off certain cookies will disable some of the features available to you through our Platform. We cannot guarantee that your experience on our Platform will be as good as it could otherwise be.

Most web browsers allow you to:

- Accept or reject cookies at any time;
- Manage cookies on a site-by-site basis; or
- Manage cookies on a cookie-type basis.

As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, web browser manufacturers maintain help pages that provide details on how you can make cookie preference choices. For more information on how to manage the most popular browsers, please see below:

- Google Chrome
- Internet Explorer
- Firefox
- Safari

For browsers not listed above, you should consult the documentation provided by your browser manufacturer.

You can also manage third party advertising preferences for some of the third parties we work with to serve advertising across the Internet by utilizing the choices available at [www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and [www.aboutads.info/choices](http://www.aboutads.info/choices). We do not guarantee that all of the third parties we work with will honor the elections you make using those options, but we strive to work with third parties that do.

For individuals located in the EEA, UK and Switzerland, additional information on how our advertising partners allow you to opt out of receiving ads based on your web browsing

history is available via the European Interactive Digital Advertising Alliance at [www.youronlinechoices.com](http://www.youronlinechoices.com)

Use your mobile device settings to control how data about your use of applications is used for purposes of showing ads that are targeted to your interests. For example, on your iOS device, enable the “Limit Ad Tracking” setting, and on your Android device, enable the “Opt Out of Ads Personalization” or “Opt Out of Interest-Based Ads” setting.

## Learn More About Cookies

If you would like to know more about cookies and how to manage them, including information about what cookies have been set on your device, All About Cookies is a useful resource as is Your Online Choices (for EU residents).

For more information about how we use personal information that we collect through cookies and other tracking technologies, please see our Privacy Policy.

## Do Not Track (DNT) Signals

Some web browsers, such as Internet Explorer, Firefox, and Safari, may give you the ability to enable a “Do Not Track” feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is not the same as blocking or deleting cookies, because browsers with a “Do Not Track” feature enabled may still accept cookies.

There is currently no industry standard for how companies should respond to DNT signals, although one may be developed in the future. As a result, we do not respond to DNT signals at this time. If we do so in the future, we will describe how in this Cookie Notice.

## Changes to this Policy

We may update this notice from time to time in response to changing technologies, industry practices, regulatory requirements, or for other purposes. Please visit this Policy regularly to stay up to date on our use of cookies. The date at the top of this Notice tells you when it was last updated.

## How to Contact Us

If you have any questions or concerns about this Policy or our privacy practices, including if you need to access this Policy in an alternative format, or if you wish to lodge a complaint about our privacy practices, please contact us at [privacy@netradyne.com](mailto:privacy@netradyne.com) or by mail at: Netradyne, Inc., 9171 Towne Centre Drive, Suite 110, San Diego, CA, 92122, USA.

Our data protection officer is also available to help you understand the measures we take to ensure we process your Personal Information appropriately. To contact our Data Protection Office, please email: [dpo@netradyne.com](mailto:dpo@netradyne.com). Because email communications are not always secure, please do not include sensitive information in your emails to us.

Our EEA representative may be reached by contacting:

- Email: [netradyne-privacy@lionheartsquared.eu](mailto:netradyne-privacy@lionheartsquared.eu)
- Post: Lionheart Squared (Europe) Limited (FAO Netradyne), 2 Pembroke House, Upper Pembroke Street 28-32, Dublin, D02EK84, Ireland

Our UK representative may be reached by contacting:

- Email: [netradyne-privacy@lionheartsquared.eu](mailto:netradyne-privacy@lionheartsquared.eu)
- Post: Lionheart Squared (Europe) Limited (FAO Netradyne), 17 Glasshouse Studios, Fryern Court Road, Fordingbridge, Hampshire, SP6 1QX, United Kingdom

## Biometric Data Privacy Policy

**Last Updated: 02/02/2022**

This Biometric Data Privacy Policy (“Biometric Policy”) supplements the Netradyne Privacy Policy. Defined terms in the Netradyne Privacy Policy shall apply to this Biometric Policy.

Netradyne, Inc. (“Netradyne”. “we”, “us” or “our” ) has instituted this following policy related to any biometric data that Netradyne possesses as a result of your use of the Services or of Netradyne’s customers’ and customer employees’ or contractors’ use of the Services. Netradyne’s customers are responsible for (a) providing you notice and obtaining consent to use of your biometric data and biometric information and (b) developing and complying with their own biometric data retention and destruction policies as may be required under applicable law.

## Biometric Data Defined

As used in this policy, “biometric data” includes “biometric identifiers” and “biometric information” as defined in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written

signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

“Biometric data” also includes any similar state or local law definitions related to any biological characteristics of a person, or information based upon such a characteristic, including but not limited to, “biometric identifier” as defined under Tex. Bus. & Com. Code §503.001, “biometric identifier” as used in Wash. Rev. Code Ann. §19.375.020, “biometric information” as used in the California Consumer Privacy Act, “biometric information” as used in the New York Stop Hacks and Improve Electronic Data Security Act, and “biometric data” as used in Arkansas Code §4-110-103.

## **Purpose for Collection of Biometric Data**

Our customers are responsible for compliance with applicable law governing any collection, storage, use, and/or transmission of biometric data they collect or facilitate collection of through the use of our Services. To the extent required by law, our customers will obtain written authorization from each employee or contractor for the benefit of the customer, Netradyne and/or Netradyne’s authorized licensors or service providers to collect, store, use, and/or transmit biometric data prior to the collection of such data.

## **Our Services May Include the Collection of Biometric Data**

We and/or our service providers also may collect, store, use and/or transmit biometric data in connection with providing certain products or services to Netradyne’s customers and customer employees and contractors. Specifically, we may record a facial image of the employees and contractors of our customers that we use for verification of identity when they are using our Services and any vehicle of the customer. With respect to such biometric data collected, stored, used and/or transmitted by Netradyne and/or its service providers, to the extent required by law, Netradyne’s customers will obtain written authorization from each employee or contractor for the benefit of Netradyne and/or Netradyne’s authorized licensors or service providers to collect, store, use, and/or transmit biometric data prior to the collection of such data.

Netradyne and/or its service provider will collect, store, use and/or transmit any biometric data solely for identifying employees and contractors of its customer and for ensuring the security of its Services, and fraud prevention. Neither Netradyne nor its service providers will sell, lease or trade any biometric data that it receives from customers or customer employees or contractors as a result of their use of Netradyne’s Services.

## **Authorization**

If you use our Services, you authorized Netradyne and its service providers to collect, capture, or otherwise obtain your biometric data in connection with the Services provided to your employer or contractor, and that Netradyne may provide such biometric data to its service providers and your employer or contractor.

## **Disclosure**

Netradyne will not sell, lease, trade, or otherwise profit from your biometric data; provided, however, that Netradyne may be paid for Services used by Netradyne’s customers that utilize such biometric data. In addition, Netradyne will not disclose or disseminate any biometric data to anyone other than its authorized service providers and customers without/unless:

- the subject of the biometric data or the subject's legally authorized representative consents to the disclosure or dissemination;
- the disclosure or dissemination completes a financial transaction requested or authorized by the subject of the biometric data or the subject's legally authorized representative;
- the disclosure or dissemination is required by state or federal law or municipal ordinance; or
- the disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

## **Retention Schedule**

Netradyne shall retain any customer's employee's or contractor's biometric data in Netradyne's possession only until the first of the following occurs:

- Netradyne receives written notice from its customer that the initial purpose for collecting or obtaining such biometric data has been satisfied, such as the termination of the employee's or contractor's employment with Netradyne's customer, the employee or contractor moves to a role within the customer for which the biometric data is not used, or the customer has discontinued using Netradyne's Services for which the biometric data was used; or
- Within 3 years of Netradyne receiving written notice of the customer's employee's or contractor's last interaction with the customer.

## **Data Storage**

Netradyne shall use a reasonable standard of care to store, transmit, and protect from disclosure any paper or electronic biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which Netradyne stores, transmits, and protects from disclosure other confidential and sensitive information.