



PRIVACY POLICY

[Last Modified: November 2022]

This privacy policy ("**Privacy Policy**") governs the data collection, processing, and usage of I.D. Systems, Inc., doing business as Powerfleet, together with its subsidiaries and affiliated companies, as part of the Powerfleet Group ("**Company**", "**we**" or "**us**" and the "**Powerfleet Group**") with respect to the data we collect from individuals who access and use our website and any of our domains or subdomains (respectively "**Website**" and "**Visitors**" or "**you**").

This Privacy Policy constitutes an integral part of any other agreement between you and us, including the Website Terms of Use (together "**Terms**"), and provides you with information regarding what Personal Data (as defined below) we collect and for what purposes, our data processing operations, the lawful basis pursuant to which we process your Personal Data, third parties to whom Personal Data will be transferred, data retention periods, etc. This Privacy Policy also describes how you may exercise your rights, where and to the extent applicable under relevant privacy legislation, including the EU General Data Protection Regulation ("**GDPR**") and the California Consumer Privacy Act ("**CCPA**") (together "**Privacy Legislation**").

Definitions used herein but not defined herein shall have the meaning ascribed to them in the Terms or the relevant Privacy Legislation.

You are not required by law to provide us with any Personal Data. Sharing your Personal Data with us is entirely voluntary. However, without your data, we would not always be able to provide you with all or some of our services.

1) AMENDMENTS

We reserve the right to periodically amend or revise the Privacy Policy, which will immediately affect the implementation of the revised Privacy Policy on our Website. The last revision date will be reflected in the "Last Modified" heading at the top of the Privacy Policy. We will make a reasonable effort to notify you if we implement any changes that substantially change our privacy practices. We recommend you review this Privacy Policy periodically to ensure that you understand our privacy practices and check for any amendments.

2) ADDITIONAL POLICIES

If you are a California resident, please review our [CCPA Notice](#).

3) OUR DETAILS AND THE DATA CONTROLLER FOR GDPR PURPOSES



Under the GDPR, we are the data controller of EU residents' Personal Data collected on our website.

If you have any questions or comments about this Privacy Policy or any concerns with respect to how your privacy and information are handled, please contact our privacy team through the contact details below. Please include your name, mailing address, and email address in the message.

We are Powerfleet, Inc.

Our address is: 123 Tice Blvd., Suite 101, Woodcliff Lake, NJ 07677, ATTN: Privacy

Phone (toll free number): +1 866.410.0152

Email: privacy@powerfleet.com (ATTN: Privacy)

The responsible authority in terms of EU data protection law as applicable:

Powerfleet GmbH
Am Seestern 4
40547 Düsseldorf
Phone: +49 (0)211 3105454-60
E-mail: kontakt@powerfleet.com

4) THE DATA WE COLLECT AND ITS PURPOSES

"Non-Personal Data": means non-identifiable data, including statistical and aggregated, and "de-identified", which can no longer be associated with any individual with no limitation (even if it was derived from Personal Data). That includes technical data transmitted to us by your device when you access and interact with the Services, such as the type of browser, operating system, type of device used, the time and date you access our services, navigation, and language preference, etc. Non-Personal Data is primarily used for technical analysis, research, and development of our services to provide, maintain, develop and enhance it, and is not used to identify individuals. Under this Privacy Policy, we can use any aggregated, statistically, and de-identified data with no limitation. Such data may be included in our proprietary information and is not deemed personal data under the law.

"Personal Data": means information that identifies or may identify, with reasonable effort, an individual. Such data includes, *inter alia*, your name, address, phone number, email, and online identifiers (such as IP address or Cookie ID).

Please see below the table which specifies the Personal Data we collect and how we use it:

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><u>Contact Us</u> If you voluntarily contact us for your interest in our products, for support, or for other inquiries, including through any form on the Company Website (e.g., "Contact US", "Quick Support by Product" or "Help Center") you may be required to provide us with certain information such as your name, email address, Company, referral subject and other related data ("Contact Information").</p> <p>If you are contacting us on behalf of another person, we value your assistance and care for others, please note that it is your responsibility to make sure that any person whose Personal Data you provide is aware of the principles of this statement and agrees that you will provide Personal Data to us on this basis.</p>	<p>We will use this data to respond to your inquiry or provide you with information regarding our services as part of our marketing efforts.</p> <p>We may further process the content of our correspondence to improve our customer service, and if we believe it is required to provide you with any further assistance (if applicable).</p> <p>We will collect the data, store it in our data systems, such as CRM or enterprise email, analyze it, provide access to our relevant staff members, and keep records of our correspondence as part of our business records keeping.</p>	<p>We process such Contact Information subject to our legitimate interest.</p> <p>If you are a customer of our services contacting us for support or any similar inquiry, we will process your data for the fulfillment of the contract between us – providing you with our services.</p> <p>After addressing your inquiry, we may retain your data in our systems as part of our business records keeping under our legitimate interest.</p>
<p><u>"Buy Online"</u> If you purchase any of our products or service via "Buy Online" page on the Website, you will be requested to provide your contact details (such as full name, phone number, address), email address, transactional and shipping information (such as the purchased goods, prices and payment method data), etc. ("Purchase Information").</p>	<p>We will use and process Purchase Information in order to enable you to purchase our products and services and ship it to you.</p> <p>We will keep your data in our systems, including our operational systems (e.g., ERP), transfer your data to our shipping partners, use your transactional data for clearance of payments and issuing invoices, and keep records of your purchases.</p>	<p>We process your Purchase Information for fulfilling our contract with you.</p> <p>After termination of the services, we will keep records of your data as part of our legitimate interests.</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><u>Accessing our Products</u> The Website contains a "Login" button allowing you to access our product's web-interfaces. As a user of any of our products, we will collect and process your account data, including your name, email, username and passwords, and additional usage data such as IP, language and other preferences, dates and times of usage, etc. ("User Account Data").</p>	<p>We will use and process your User Account Data in order to provide you with access to our products and services. We will also use that data to ensure the security of our products and services.</p> <p>We will verify your identity through the username and password you have provided, monitor you activity through our security measures and tools, and manage your account within the relevant product.</p>	<p>We will process your User Account Data for fulfilling our contract with you.</p> <p>After termination of the services, we will keep records of your data as part of our legitimate interests.</p> <p>** please note that any use of our services and products is also subject to the separate agreement between us and our relevant customer with whom we engaged to allow you the use of our products and services ("Account Owner"), and the DPA attached to such agreement.</p>
<p><u>Subscribing to our Mailing lists</u> In the event you sign up to receive our marketing communications or any other marketing materials, you will be requested to provide your contact details, such as email address.</p>	<p>We will use your email to send you our newsletter and other Marketing Materials as part of our marketing efforts to facilitate our business.</p> <p>We will collect your email and other details and add it to our marketing lists. We may manage it through a dedicated system. We will send you Marketing Materials.</p>	<p>We process such Personal Data subject to your consent.</p> <p>You may withdraw consent at any time through the "unsubscribe" link within any email sent to you or by contacting us directly.</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><u>Recruitment Information</u></p> <p>In the event you apply for a job, we will collect your CVs as uploaded by you, including your name, email address, phone number, information regarding your education and skills, employment history, and your photo (to the extent provided by you). Also, where allowed or required by law, we may process diversity and inclusion data regarding your candidacy, such as ethnicity, gender, or any disability. In addition, we may collect further information from public and online sources, referees, and former employers and combine such data with your other data (all together “Recruitment Data”).</p> <p>Further, we may receive information from third parties, such as recruiting agencies, about candidates interested in working at the Powerfleet Group. In such cases, we rely on the agreements we have with the third parties for obtaining your information.</p>	<p>We will process such Recruitment Data as part of our recruitment and screening efforts to decide whether you can suit a position in the Company.</p> <p>Also, sometimes we will process your Recruitment Data to enable us to comply with corporate governance and legal and regulatory requirements.</p> <p>After completing the recruitment process, we will retain the data as part of our internal record keeping, including for legal defense from any future claim.</p> <p>If we hire you, your Recruitment Data may be used in connection with your employment and our corporate management.</p> <p>We will keep your Recruitment Data, analyze it, store it in our systems, use it or contact you for further recruitment steps (e.g., interview) and keep records of our interaction with you.</p>	<p>We process such Recruitment Data subject to our legitimate interest.</p> <p>In some cases, for example, where we will ask you to provide health related data or diversity and inclusion data, we will process your data based upon your consent. You may always withdraw consent at any time by contacting us.</p> <p>We will retain your data for records keeping and future defense from legal claims under our legitimate interest.</p>
<p><u>Online Identifiers</u></p> <p>We use third-party cookies on the Website. As further detailed below, these cookies assist us with improving our systems and services. The Personal Data processed is an online identifier, either a cookie ID, the IP address, etc.,</p>	<p>We will use your Online Identifiers to improve our systems and services.</p> <p>We will collect your information and analyze it, whether directly or through the use of third-party systems and services. We will aggregate and analyze the</p>	<p>Strictly necessary cookies which are required for the proper and basic operation of the Website will be processed in our legitimate interest.</p> <p>Other cookies data, including any targeting and marketing cookies, will</p>

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
alongside the relevant data regarding your usage of the Website (e.g., date and time of usage, pages visited, referrer webpage, device unique identifier, etc.)	data to produce insights regarding your usage and your suitability to our services as a potential customer or contact point. We will use this data and insights as part of our marketing efforts to personalize the experience you have with us.	be processed subject to your consent, provided through the Cookie banner on our website. For more information regarding cookies, see below "Cookies Usage".

Please note that the actual **processing operation** per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations, made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. Transfer of personal data to third-party countries, as further detailed in the Data Transfer section, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of Our service, as well as to protect the security or integrity of our databases and Website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

5) COOKIES USAGE

As explained above, we use cookies to improve your experience while using the Website. Cookies are small text files implemented on the user's computer or web browser that allow some tracking and identification of the user to collect data regarding its data usage. We may use various types of Cookies:

- Essential Cookies – which are strictly necessary for the Website to work correctly (usually appear under our name/cookie tag);
- Functional Cookies – designated to save your settings on the Company Website - your language preference or other view preferences (also, under our name/cookie tag);
- Session Cookies – used to support the Company Website's functionality – such Cookies are usually stored only temporarily during a browsing session and are deleted from your device when you close the browser.
- Targeting Cookies - These cookies are used to collect information from you to help us improve our services and Company services and serve you with targeted advertisements that we believe will be relevant to you (e.g., Google and 6Sense Cookies).



- Social networks Cookies - Social Plug-In Cookies (e.g., Facebook, Twitter, LinkedIn Cookies, or pixels, etc.) enable sharing your usage information with your social network's accounts.
- Analytics Cookies - give us aggregated and statistical information to improve the Company's services and further develop it e.g., Google Analytics, Google Firebase Catalytic, 6Sense, etc.
- Third-party services used by us – for example, an external service supporting our recruiting options through the Company Website (e.g., Comet or Workday), or an external service that allows us to screen short videos on the Website (e.g., YouTube or Vimeo).

Please note that the data collected by the use of Cookies may be linked to and combined with any other data, including Personal Data.

In addition, Cookie's data is usually collected using third-party services, like Google, Facebook, etc. In those cases, your Personal Data might be transferred to those third parties, which might link it and use it together with other information they have on you from other sources. Such data is "owned" and processed separately by those third-parties under their terms and conditions and the direct accounts or subscriptions you have with those third parties. For example, if you have a Facebook account, the Personal Data collected through Facebook's Cookies on the Company Website might be linked to other data that Facebook collects from you as a Facebook user, and might be used by Facebook per the independent agreements between you and Facebook.

The specific cookies we currently use, and your choices with regard to such use are detailed [HERE](#).

6) METHODS FOR COLLECTING YOUR DATA

According to the nature of your interaction with Company services, we may collect information as follows:

- Provided by you voluntarily – we will collect information if and when you choose to provide us with information, such as filing any contact form.
- Provided by your admin as a user of any of our products and services – if you are a user of our services, some of your data, including your User Account Data, may be provided to us through your admin., i.e., the relevant Account Owner.
- Automatically – we may use cookies and similar tracking technologies (as elaborated in the Cookies Section above) to gather some information automatically when you access the Website.
- Provided to us by third parties – as part of our digital marketing efforts as described above.

7) DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH

We do **not** share any **Personal Data** collected from you with third parties or any of our partners except in the following events:

- Legal Requirement: We will share your information in this situation only if we are required to do so to comply with any applicable law, regulation, legal process, or governmental request (e.g., to comply with a court injunction, comply with tax authorities, etc.);
- Our Partners and the Powerfleet Group: We may share your Personal Data with our subsidiaries, affiliated and intermediary companies to facilitate our global operations, subject to section 8, "Data Transfer" below;
- The Relevant Account Owner: if you are a user of our products and services, some or all of your User Account Data will be shared with the relevant Account Owner, as the customer who engaged us for using the relevant product or system.
- Policy Enforcement: We will share your information solely to the extent needed to (i) enforce our policies and agreements; or (ii) to investigate any potential violations thereof, including without limitations, detecting, preventing, or taking action regarding illegal activities or other wrongdoings, suspected fraud or security issues;
- Company's Rights: We will share your information to establish or exercise our rights, to prevent harm to our rights, property, or safety, and to defend ourselves against legal claims, when necessary, subject to applicable law;
- Third Party Rights: We will share your information solely to the extent needed to prevent harm to the rights of our customers, yourself, or any third party's rights, property, or safety;
- Service Providers and Services: We share your information with third parties that perform services on our behalf (e.g., executing the purchase, processing the payment, shipment, marketing and support, etc.). These third parties may be located in different jurisdictions.
- Corporate Transaction: We may share your information in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy;
- Authorized Disclosures: We may disclose your information to third parties when you consent to a particular disclosure. Please note that once we share your information with another company, that information becomes subject to the other Company's privacy practices.

Where we share information with service providers and partners, we ensure they only have access to such information that is strictly necessary in order for us to provide the



services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations.

8) DATA TRANSFERS

Any information you provide us may be transferred to and processed in countries other than the country from which you accessed the Company services. Such data transfers are subject to intergroup personal data transfer agreements, data processing agreements with our service providers, and the relevant obligations under the GDPR. If you are a resident of the European Economic Area ("**EEA**") we will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer outside of the EEA. If you are a resident of a jurisdiction where the transferring of your Personal Data requires your consent, then your consent to this Privacy Policy includes your express consent for such data transfer.

9) YOUR RIGHTS

Individuals have certain rights under applicable privacy laws concerning their Personal Data. Subject to your jurisdiction (and additional conditions), these rights may include:

- The right to be informed – you have the right to be provided with information regarding our data collection and privacy practices, as detailed in this Policy. If you have any additional questions, please contact us.
- The right to access your Personal Data – you have the right to request a confirmation from us that we process your Personal Data, and in some cases, be provided with a copy of the Personal Data we process.
- The right of rectification - you have the right to require to update Personal Data that is not correct;
- The right to the erasure of your Personal Data (the right to be forgotten) – you have the right to require the erasure of certain Personal Data if specific conditions are satisfied. This right is not absolute. We may reject your request under certain circumstances, including where we must retain the data in order to comply with legal obligations or defend against legal claims, etc.;
- The right to restrict the processing of your Personal Data – you may be entitled to limit the purposes for which we process your Personal Data if specific conditions are satisfied;
- The right to object to the processing of your Personal Data – you have the right to object to the processing of Personal Data, in the event the basis for processing is our legitimate interests. However, we will be permitted to continue the processing if our legitimate interests override your rights, or

when processing is necessary to establish, exercise, or defend a legal claim or right, etc.;

- Data portability – you have the right to get a copy of your data in a format that may allow you to "port" it to a third-party;
- The right to file a complaint to a supervisory authority – specifically, with regards to Personal Data collected about you in the EEA or UK, please contact the applicable EU Data Protection Authority.
- The right to withdraw your consent – when the lawful basis for processing your Personal Data is your consent. For example, you may unsubscribe at any time from our mailing list.

You may exercise any or all you're the above rights concerning your Personal Data by contacting us by sending your Data Subject Request to privacy@powerfleet.com (ATTN: Privacy) or using the DSR form available [Here](#).

Where we are not able to provide you with the information for which you have asked, we will endeavor to explain the reasoning for this and inform you of your rights, including the right to complain to the relevant supervisory authority. We reserve the right to ask for reasonable evidence to verify your identity before providing you with any such information per applicable law.

10) RETENTION

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you will express your preference to opt-out, where applicable.

The criteria used by us to determine our retention periods are as follows:

- We retain Personal Data for the periods needed in order to achieve the purpose for which Personal Data was collected.
- We retain Personal Data for the periods needed in order to comply with our obligations under applicable laws.
- If you have a dispute with us, we may retain certain types of Personal Data as necessary and applicable to your claims, including any legal proceedings between us, until such dispute is resolved, and following, if we find it necessary, in accordance with applicable statutory limitation periods. In addition, in the event you request to exercise your rights, we will maintain the relevant correspondence for as long as needed to demonstrate compliance.

At our sole discretion, we may rectify or erase information from our systems without prior notice to you, once we deem it no longer necessary for such purposes.

11) SECURITY

We implement extensive security measures to reduce the risks of damage, loss of information and unauthorized access or misuse of Personal Data. We implement



appropriate data collection, storage, and processing practices and security tools to protect personal data against unauthorized access, alteration, disclosure or destruction. You should be aware that no security measures are completely fail-proof, and it is impossible to prevent any and all threats to the security of data and systems. Therefore, you should be aware that any digital personal data processing holds certain inherent risks, and we cannot guarantee that our services and databases will be immune to any wrongdoings, malfunctions, unauthorized interceptions or access, malware attacks or other kinds of abuse and misuse.

12) CHILDREN

Our website is not directed nor is it intended for use by children under the age of sixteen (18) and we do not knowingly process a child's information. We will immediately discard any information we receive from a visitor considered a child upon our discovery that such a visitor shared information with us. If you are under eighteen (18), please read the terms of this Policy carefully with your parents or other legal guardians. Please contact us through the above means of contact if you believe a child has shared any information with us.



PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

In this section, we provide information for California residents, as required under California privacy laws, including the CCPA, which requires that we provide California residents certain specific information about how we handle their personal information, whether collected online or offline. Under the CCPA, "**personal information**" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA.

Except for the right to opt-out and the right of non-discrimination, this section does not apply to California residents with whom we transact or communicate solely in the context of providing or receiving a product or service to or from a company that employs such residents or engages such residents as contractors. This section also does not apply to the personal information we collect about job applicants, independent contractors, or current or former full-time, part-time and temporary employees and staff, officers, directors or owners of the Company or any affiliated entities.

CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT, DISCLOSE, AND SELL

We have set out in the Privacy Policy the categories of personal information (as defined by the CCPA) about California residents that we collect which include: (A) Identifiers, (B) Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), (D) Commercial information, (F) Internet or other similar network activity, and (I) Professional or employment-related information. As noted below, we do not sell your personal information or disclose it to third parties for business purpose. We may disclose each of these categories of personal information to our service providers, who are not permitted to use your personal information except as necessary for performing services on our behalf. Further, we may disclose each of these categories of personal information to our subsidiaries, affiliated and intermediary companies as part of our global operations. We collect these categories of personal information from the sources and for the purposes described above under the heading "*Types of Data We Collect and Purpose of Processing*". Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident. Please note that the CCPA defines the term "sale" very broadly to include any exchange of data for consideration of any kind, not simply selling your data for monetary compensation.

CALIFORNIA CONSUMER RIGHTS

California law grants consumers certain rights and imposes restrictions on particular business practices as set forth below. California consumers have the right to request that we disclose what personal information we collect, use, disclose, and sell about you.

Right to Opt-out of Sale of Personal Information ("Do Not Sell")

California residents have the right to opt-out of the sale of their personal information. Please note that we do not sell your personal information.



Requests for Copy, Deletion and Right to Know

Subject to certain exceptions, California consumers have the right to make the following requests, at no charge, up to twice every 12 months. Please see "Submitting Requests" for instructions on how to exercise your rights.

Deletion: the right to request deletion of personal information that we have collected about you, subject to certain exemptions.

Copy: the right to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months.

Right to Know (Collection): Where we have collected personal information about you, the right to request that we disclose certain information about how we have handled your personal information in the prior 12 months, including the categories of personal information collected; categories of sources of personal information; business and/or commercial purposes for collecting and selling your personal information; and the categories of third parties/with whom we have disclosed or shared your personal information.

Right to Know (Disclosure and Sale): Where we have sold or disclosed for a business purpose your personal information, the right to request that we disclose certain information about how we have handled your personal information in the prior 12 months, including the categories of personal information collected; categories of third parties to whom your personal information has been sold and the specific categories of personal information sold to each category of third party; categories of third parties to whom personal information has been disclosed; and the categories of personal information that we have disclosed or shared with a third party for a business purpose.

Submitting Requests. You can exercise your rights by emailing us at privacy@powerfleet.com (ATTN: Privacy), calling us at +1 866.410.0152 (toll-free number), or the designated **DSR** form on our website. Once you submit your request, we will take steps to attempt to verify your identity. We will seek to match the information in your request to the personal information we maintain about you. As part of our verification process, we may ask you to submit additional information and use identity verification services to assist us. Please understand that, depending on the type of request you submit, to protect the privacy and security of your personal information, we will only complete your request when we are satisfied that we have verified your identity to an appropriate degree of certainty. We will make every reasonable effort to respond to you within 45 days after receiving a verified request. If we cannot meet this timescale, we will respond as soon as possible over the next 45-day period.

INCENTIVES AND DISCRIMINATION

The CCPA prohibits discrimination against California consumers for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California consumers related to their personal information.

That means that if a consumer exercises their rights under CCPA, businesses may not discriminate against them. A "Discrimination" includes denying or providing a different level or quality of goods or services or charging or suggesting that a business will



charge different prices or rates or impose penalties, unless doing so is reasonably related to the value provided to the consumer by the consumer's data.