

Privacy Statement Conneqtech B.V.

When you use the services of Conneqtech B.V., we almost always need to record your personal data. It is our policy and our aim to deal carefully and transparently with the personal data we receive from you. With this Privacy Statement we tell you how we deal with your personal data, for what purposes and how we process and store your personal data. Therefore, this Privacy Statement applies to all your personal data we process when you visit our website, use our services or when we have contact with you.

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Who are we?

Based on its extensive knowledge of the 'Internet of Things', Conneqtech B.V. offers smart ICT solutions for companies and organisations that enable the connection of traditional or other products and services to the Internet. The collection, management and analysis of data and user data, including telemetry data from internet of things (iot) devices is an essential part of Conneqtech's services. Conneqtech refers to the private limited liability company Conneqtech B.V., using the trade names 'Conneqtor', 'My GPS Tracker', and 'NFNTY' that are associated with Conneqtech. Conneqtech B.V. is registered with the Chamber of Commerce under number 63567385 and has its registered office at Einsteinweg 35a in Bunschoten-Spakenburg.

You can find more information on our website www.conneqtech.com and it goes without saying that you can contact us at our general e-mail address info@conneqtech.com or by telephone on +31 33-2053400

Why and how do we collect information and data from you?

Your information and personal data are mainly collected and processed by us in order to offer and to continue offering you our products and services. We like to build up a long-term relationship with you, so that we can be of service to you in the future and make offers that are of interest to you, based on the services that you have purchased from us in the past and based on your interests. Below there is an overview of the way in which we collect and process information and personal data from you. We do this directly, by means of third parties or automatically.

Directly

We collect and manage information directly, i.e. directly from you, when you purchase services and/or products produced by us or when you purchase a product with our app as an integral part of that product. We also collect information from you when you request information from us about our products and services, contact us or when you use our products and services in any other way. The following is an overview of the personal data that are processed by us, depending on the service you use.

If you use our services as a client and therefore as a user and activate our app and use our anti-theft protection, we will process the following personal data about you:

- Your first name and surname;
- Your date of birth;
- Your place of birth;
- Your nationality;
- Your invoice and postal address details;
- Your telephone number;
- Your e-mail address;
- Your IP address;
- Your payment information, including a bank account number, credit card or debit card numbers, and your purchase history;
- Your internet browser and device type;
- Other personal data that you actively provided to us, for example by means of our app, website, by e-mail in correspondence or by telephone.

If you are not one of our clients/users and have not activated our app, we will not process any personal data about you, only encrypted anonymised location data.

When you use the Conneqtech website, the following personal data will be processed:

- The details of your activities;
- Your IP address;
- Your internet browser and device type;
- And, when you enter answers to questionnaires or surveys on our website or offline.

When you use the Conneqtech portal (portal.mygpsracker.nl), the following personal data will be processed:

- Your first name and surname;
- Your company name;
- Your invoice and postal address details;
- Your telephone number;
- Your e-mail address;
- Your IP address;
- Your Location Data and related data to determine your location, including speed, distance, date, time, usage data, etc.
- Your payment information, including a bank account number, credit card or debit card numbers, and your purchase history;
- Your internet browser and device type;
- Other personal data that you actively provided to us, for example by means of our app, website, by e-mail in correspondence or by telephone.

You are not obliged to provide us with personal data. However, when you do not or do not want to, you may not be able to use our products and services or only to a limited extent.

By means of third parties

We may also collect information about you from third parties. For example, we may collect your name, e-mail address, and other information you distributed on social media platforms when you interact with us through social media.

Automatically

We collect information - including personal data - from you automatically with cookies, web beacons and other technologies when you visit our website or use our services, including our apps. The information we collect automatically includes, but is not limited to, domain name, browser type and operating system, web pages viewed, links clicked, Internet Protocol (IP) address, time spent on the website and/or use of our services and the referring URL or web page that led you to our website. Insofar as permitted by law or with your consent, we may combine this information we collect about you with other information.

What do we use your information for?

We use your information, including your personal data, for the following purposes:

- **To supply our products and services to you;** to accept, verify, process and deliver orders and returns; to process payments; for warranty, technical support or other similar purposes; to create and maintain client accounts.
- **To create and maintain data for suppliers' management purposes;** to supply the requested products and services, and to carry out other acts for the purpose of supplier management. The information we collect from our suppliers is also used for the purposes set out in this Chapter.
- **For customer service purposes;** including for warranty, technical support or other similar purposes; to respond to your questions and for other purposes for which you contact us.
- **Communication;** to communicate with you. We can contact you in various ways, including by post, e-mail, telephone and/or text message.
- **Administrative purposes;** including to manage our inventory; to help us better understand the access to and use of our website; to provide information and reports to our investors, potential partners, service providers, regulators and others; to implement and maintain security, anti-piracy, fraud prevention and other services designed to protect our clients, users, suppliers, ourselves and public order; to enforce this policy, our terms and conditions and other policies.
- **Research and development purposes;** including to improve our website, products, services and client experience; to understand our client and user data; and for other research and analytical purposes.
- **Statutory compliance;** to comply with applicable statutory obligations, including responding to a summons or court order.
- **To protect ourselves and others;** when we believe it is necessary to investigate, prevent or take action against unlawful activities, suspected fraud, situations relating to possible threats to the safety or security of a person, or breaches of our terms and conditions or this policy.
- **Marketing;** when required by law, insofar as it is permitted by law or with your explicit consent for marketing and proportional purposes, including by e-mail. We may use your information, such as your e-mail address, to send you news and newsletters, special offers and promotions, or to contact you in any other way regarding products, services or information that we think may be of interest to you. We may also use your information to enable us to advertise our services on third-party websites or through other channels.

When can we disclose your details?

We may disclose your information, including your personal data, in the following ways:

- **Affiliated companies and subsidiaries** We may disclose your information to current or future affiliates or subsidiaries for the purposes described above under "What do we use your information for". We may also share your information for storage purposes with companies outside the European Economic Area (EEA), for example with companies based in the United States.
- **Users of our website and apps** A user name or any information that you enter on our website, including unrestricted images, comments and text, may be available to all users of our website and may be made publicly available after it has been posted.
- **Service providers** We may disclose personal data to external suppliers, service providers, contractors or other third parties to enable them to perform acts on behalf of Conneqtech or its affiliated labels and companies. For example, these service providers may assist us with managing our website, processing data, including job applications, administration or payments for example. Conneqtech shall conclude a

data processor's agreement with these service providers, which Conneqtech uses to oblige said service providers to treat your personal data with care.

- **Other non-affiliated third parties** Insofar as permitted by law or with your consent, we may disclose your information to third parties, with whom we have a marketing or other relationship, for their own marketing purposes.
- **Business transfers** We may disclose your information to another entity in the context of, including during negotiations on, an acquisition or merger, sale or transfer of a business unit or assets, a bankruptcy proceeding, or as part of any other similar business transfer.
- **In response to legal proceedings** We may disclose your information to comply with the law, legal proceedings, a court order or another legal process, such as in response to a summons or in response to a lawful government request.
- **To protect ourselves and others** We disclose your information if we are of the opinion that this is essential to investigate, prevent or take action against unlawful activities, suspected fraud, situations relating to possible threats to the safety or security of a person, or breaches of our terms and conditions or this policy.
- **Aggregate and anonymised information** We may disclose aggregate or anonymised information about you to third parties for marketing, advertising, research or similar purposes.

Website

When you use one or all of our websites, we store certain information about you. This happens automatically. The information we store about you may include:

- The URL you come from;
- The URL you go to;
- The browser you use;
- Your IP address;
- The date and time you accessed one of our websites;
- Information about the hardware, software and internet browser you use.

We use this information as part of the normal use and management of our website and we may disclose this information in groups. This grouping makes it impossible to trace the data back to a particular individual user. We are not interested in information that says anything about the identity of the visitor to one of our websites. However, we are interested in information that says something about the use of one or all of our websites, such as the number of visitors, the pages that are visited most and the busy times when one or all of our websites are visited.

Cookies and Tracking mechanisms

We and our affiliated labels and subsidiaries use cookies, tracking pixels and other tracking mechanisms to track information about your use of our website and the services that available through our website. We may combine this information with other information we have received about you.

A cookie is a string of information consisting solely of text that a website transfers to the browser's cookie file on a computer's hard drive so that it can remember the user. A cookie generally contains the name of the domain the cookie came from, as well as the lifespan of a cookie and a value, generally a randomly generated unique number. This helps us to provide you with a good experience when you use our website and to improve our website, products and services. We use cookies for the following purposes:

- Where they are essential to the operation of our website;
- To create anonymous, aggregated statistics that provide us with insight into the way users use our website and to help us improve the functionality and structure of our website.

You can only delete cookies yourself, because they are stored on your computer, tablet or smartphone. You can use the above tips for deletion or you can use the manual of your browser. You can unsubscribe from cookies by changing your browser settings to not storing cookies. You can also use your browser settings to delete all the information that was stored previously.

Clear GIFs, pixel tags and other technologies

Clear GIFs are small images with a unique identifier, similar in function to cookies, which are invisibly embedded on web pages. We may use clear GIFs - also known as web beacons, web bugs or pixel tags - in connection with our website to track the activity of visitors to our website, to help us manage content and to compile statistics about the use of our website. We may also use clear GIFs in HTML e-mails to our users to obtain e-mail response rates, to see when our e-mails have been viewed, and to see if our e-mails have been forwarded.

Third-party analytics, measuring & analysing visitor behaviour

We use automated devices and applications to evaluate the use of our website and services. We use these tools to help us improve our services, performance and user experience. These devices and applications may use cookies and other tracking technologies to deliver their services.

As part of their "Analytics" service the American company Google places cookies on our websites and apps. We use the services of Google Analytics to obtain insight into visitors' use of our websites.

The information we collect in this way is anonymised as much as possible and stored on Google's servers in the United States. Your IP-address is explicitly not given. On the website of www.google-analytics.com you will find their privacy policy. With Google Analytics and Firebase we collect the following data:

- The number of unique visitors;
- How often users visit our websites;
- The pages of our websites that are viewed by users;
- How long certain users view a page;
- From which pages users leave the websites again.

Google Analytics can provide this information to third parties if Google Analytics has a statutory obligation to do so or insofar as those third parties process the information on behalf of Google Analytics. We cannot control this. We have not given Google Analytics permission to use the analytical information obtained through our websites for Google services other than those agreed between Conneqtech and Google Analytics. If you want to unsubscribe you can download and install the Google Analytics Opt-out Browser Add-on for your current web browser.

Below you will find the cookies that we use on our websites and an overview of all the partners we work with:

Analysis for the purpose of management information

Some of your data may be used for management information, for example data such as your usage, family composition and your country and province of residence. Your data will always be completely anonymised and absolutely cannot be traced back to you as a person.

International transfer of Personal Data

We may use, disclose, process, transfer or store personal information outside the country in which it was collected, such as the United States and other countries. Countries that may not provide the same level of protection with respect to personal data as the country where you are located. Furthermore, there are situations where personal data is transferred to third-

party service providers in the United States or other countries to provide services to Conneqtech, such as payment processing, web hosting, etc. Conneqtech uses third-party service providers to process data for supporting services and administrative purposes. When Conneqtech uses another company to perform a function of this nature, Conneqtech shall require such a party to protect Conneqtech's personal data and they shall not be authorised to use this personal data for any other purpose.

The purpose and lawful basis for processing personal data

Necessary for the performance of the agreement we concluded with you

Your personal data are mainly processed when you purchase one of our services or products. We need your personal data for the performance of the agreement between you and Conneqtech. If you do not provide us with the personal data requested by us, you will not be able to use or purchase our services or you may only be able to use or purchase them in part.

We process your personal data for the following purposes:

- To enable you to use our products and services;
- To collect, analyse, manage, store and process the information obtained, including personal data;
- To send our newsletters, e-mails and/or offers;
- To call and/or e-mail you if this is necessary for the performance of our agreement with you;
- To inform you of changes to our products and services, and updates;
- More generally, in order to make our products and services possible and to optimise them for you.

When we process your personal data, we comply with the statutory requirements as set out in the GDPR, the General Data Protection Regulation.

Therefore there is always a legal basis for processing your personal data. In doing so, we have carefully weighed up your interests against those of our organisation.

For a legitimate organisational interest

For processing - including the storage and protection - your personal data in the framework of improving our services. For example, but not exclusively, Conneqtech has a legitimate organisational interest by way of marketing activities, surveys and research. This enables us to improve our services continuously, including by means of direct marketing.

We process your data at contact times with our company through our website or one of our employees, so that we are able to deal with your questions, complaints or comments quickly and able to assist you adequately. This working method also enables us to build a long-term relationship with you, which is our ambition and an aim we continue to work for.

Statutory obligation

Processing and consequently storing some of your personal data is required in order to comply with statutory obligations.

Consent

If we need more personal data from you, we will ask for your explicit consent.

How long do we retain your personal information?

We will not retain your personal data any longer than necessary to achieve the purposes set out in this Privacy Statement, unless we have your explicit and recorded consent to keep your data longer, for example to improve our service, and unless we have a statutory obligation to keep your personal data longer.

Financial data

We keep our financial records for 10 years. This means that all your data and documents that pertain to financial transactions between you and Conneqtech will be kept for 10 years after purchasing our products and services. If you do not use our app for two years, we will anonymise your account information automatically.

Data from contact times

Chat times with our customer services are deleted within 14 days of the contact time, unless the content of the messages is relevant to the service or product you purchase from us or to any future services or products. Recorded phone calls and WhatsApp calls are deleted within three months. E-mail messages sent to you or received by us and complaints submitted by you will be kept for a maximum of 10 years.

Processing personal data with your consent

We shall retain personal data we process with your consent until you revoke your permission and have informed us of the same in writing. If you have not logged in to us for two years or more, we will anonymise your account information automatically.

How is your personal data secured and where do we store it?

We take the security of your personal data extremely seriously. We have technical and organisational security measures in place to protect your personal data from loss or unauthorised use, such as unauthorised access to your personal data. This takes account of the state of the art and the cost of implementation, in order to guarantee an appropriate level of security in view of the risks involved in processing and the nature of the data to be protected. Our policy is that only those Conneqtech employees, who actually need access for the performance of their work, have access to your personal data. In order to strengthen your privacy, confidentiality has been agreed with all Conneqtech employees and an individual privacy statement has been signed by them.

Your data will be stored on European territory, except for your name and e-mail address. So-called subprocessors have been engaged to ensure the correct operation of our services. These subprocessors only act on behalf of Conneqtech and only when the subprocessors in question have introduced sufficient safeguards in respect of technical and organisational security measures. These appropriate safeguards consist of binding corporate rules, approved standard data protection clauses and the EU-US Privacy Shield.

Users are required to protect their user name or user ID for use on our website and are responsible for any misuse or unauthorised use of our website via their password and user ID. Users are responsible for maintaining the confidentiality of their passwords. If, as a user, you have reason to believe that your interaction with us is no longer secure, for example, if you believe that the security of the account you have with us has been compromised, you should contact us immediately at privacy@conneqtech.com or by letter to our address at Einsteinweg 35a, 3752 LW in Bunschoten-Spakenburg, for the attention of the Privacy Officer

Your rights - inspect, rectify, restrict or erase

You are entitled to inspect, rectify, restrict or erase your personal data. You are also entitled to withdraw your consent for data processing or to object to us processing your data.

You can always choose not to provide us with information and personal data, although this may be necessary to use our services and products.

You are also entitled to data portability. This means that you can submit a request to us to send the personal data we have on you in a computer file to you or to another organisation designated by you. You can send a request for inspection, rectification, erasure or data portability of your personal data or a request to withdraw your consent or your objection to processing personal data to privacy@connegtech.com.

To ascertain that the inspection request was made by you, please submit a copy of your proof of identity with your request. Please black out your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and citizens service number (BSN) on this copy to protect your privacy. We will respond to your request as soon as possible, but no later than within four weeks.

You are also entitled to restrict our processing of your data when:

- You dispute the accuracy of the personal data until we have taken sufficient measures to correct or verify it;
- The processing is unlawful, but you do not want us to erase the data;
- We no longer need the personal data for processing, but you need it to establish, exercise or defend legal claims;
- You objected to processing on the basis of a legitimate interest (see below), pending verification of whether the company has compelling legitimate reasons to proceed with processing.

When a restriction is placed on personal data in this way, we will only process it with your consent or for the purpose of establishing, exercising or defending legal claims.

Complaints

Conneqtech would also like to point out that you have the option to submit a complaint about the way we deal with your personal data. You can let us know by sending an e-mail message to privacy@conneqtech.com or sending a letter to the Privacy Officer at our address at Einsteinweg 35a, 3752 LW in Bunschoten-Spakenburg. We will do our best to resolve your complaint as soon as possible.

You may also submit your complaint to the national supervisory authority, the Dutch Data Protection Authority by using the following link.

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

This privacy statement was most recently reviewed and amended on 13 May 2019.