

SYCADA - PRIVACY POLICY

SYCADA BV respects your privacy. Sycada BV and its affiliates (“Sycada” or the “Company”) offer driver behavior scoring and driver training services to users of the DriveTag beacon (the “Beacon”), the Smartphone applications (the “Application”) and/or portal services (the “Website”), (collectively referred to as the “Services”).

When you use our services, you’re trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, and delete your information.

This Privacy Policy is incorporated as part of the Sycada Terms of Use a (the “Terms of Use” or the “Terms”). Your use of the Services is subject to the Terms of Use and this Privacy Policy and indicates your consent to them.

To use our Services you must have a driver's license valid in the country in which you are using the service.

In this Privacy Policy, the term “personal information” means information which you provide to us which personally identifies you, such as your name, email address, your Beacon and Smartphone device details, and data that we collect from the Beacon and the Applications to allow us to assess and score your personal driving style.

Contact Sycada-Privacy concerns reports

If you have any questions about this Privacy Policy, or if you believe that your privacy has been compromised in the course of using the Services, please contact Sycada at: privacy@sycada.com.

User Accounts & Accessing the Services

Please note that when you use our Services, Sycada will set up an account (the “Account”. Sycada will collect and use your information, including meta-data (as described below), in accordance with this Privacy Policy.

- Sycada will link all of your information with your registered Account. This includes information received from all devices which you have chosen to sign in;
- Sycada may also establish and require from time to time additional or different means of identification and authentication for logging in and accessing the Services or for accessing certain features or designated sections of the Services.
- Your login details are your responsibility. You are fully accountable for any use or misuse of your Account and personal details as a result of conveying your login details to someone else. You must maintain your login details in absolute confidentiality and avoid disclosing them to others. If you set a password, make sure that you change your password frequently and at least once every six months.

Information that is being collected

We want you to understand the types of information we collect as you use our services.

Sycada collects information to support you in becoming a safer and more energy efficient driver. We provide our service to help you save costs, reduce your carbon footprint and to be safer in traffic.

Information we collect as you use our services:

The following personal data of driver is stored by the app:

- Full name
- Username
- OAuth token with a 2-hour expiration
- Location data when driving
- Speed profile and speed limit violations when driving
- Phone use when driving
- Drive Score when driving
- Crash logs upon an impact
- DriveTag ID

The following personal data of driver is stored by the website:

- Full name
- Username / password
- Email address
- Location data
- Drive Score(s)
- Crash data
- DriveTag ID

You can adjust your Privacy Settings in case you do not want us to collect and store location data, in which case, your journey information will contain no address data.

Meta-data(information about your device and app use):

Sycada collects information about the use of the Services and information from the device you have our app installed on, for example:

- Sycada may collect and record how often you use our Services and for how long, your device type, unique identifiers, operating system type & version, battery usage, and information that you viewed on our Services.
- We also collect information about the interaction of your devices with our Services, including, crash reports, system activity, and the date, time, and referrer URL of your request.

Data for maintaining & improving our services:

- We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues you report to us. And we use your information to improve the service or to develop new features or services. For example, Sycada may use diagnostic data from your Beacon to improve accuracy of data and longevity of battery life.
- We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your usage of the Services to do things like optimize product design.

Data allowing us to communicate with you:

- We also use your information to send you updates, notices, announcements, users' requests and additional information related to the Services (including through push notifications, email address and SMS);
- We may also use your information to conduct surveys and questionnaires; And if you contact Sycada we may keep a record of your request in order to help solve any issues you might be facing.

To protect Sycada, the public and for Legal reasons:

We may also use and process your information and content, using different technologies to the following purposes:

- To enforce the Terms of Use or Privacy Policy;
- To contact you when Sycada believes it to be necessary;
- To comply with any applicable law and assist law enforcement agencies under any applicable law, when Sycada has a good faith belief that Sycada's cooperation with the law enforcement agencies is legally mandated or meets the applicable legal standards and procedures;
- To detect abuse and illegal activity; to detect and prevent fraud, misappropriation, infringements, identity theft and other illegal activities and misuse of the Services;
- To handle breakdowns and malfunctions;
- To take any action in any case of dispute, or legal proceeding of any kind between you and the Services, or between you and third parties with respect to, or in relation with the Services;
- For purposes provided under this Privacy Policy and Terms of Use;
- To help improve the safety and reliability of our Services. This includes detecting, preventing, and responding to security risks, and technical issues that could harm Sycada, our users, or the public;
- To create aggregated and/or anonymous data (where such data does not enable the identification of a specific user).

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

Sharing your information

Sycada will only share your personal information with others to the extent that this information is used to provide you with additional services, for example:

- As basis for your car insurance policy that includes billing based on journey data of drive style data.
- As part of your car leasing contract or enterprise lease car agreement.
- To allow journey data to be integrated in mobility budget or mobility services schemes provided to you either directly or via your employer.

In all such cases, Sycada acts in the role of data processor and the provider of the other services as data controller.

Controlling your personal information

You can always review and update certain information by visiting your Account & Login settings. If you find that the information associated with your Account is not accurate, complete or updated, then you should make all necessary changes to correct it. Please keep in mind that false, incorrect, or outdated information may prevent you from setting up an Account and impair the ability to provide you with Services.

Privacy controls:

Your in-app Privacy Settings provide you with quick access to settings and tools that let you safeguard your data and decide how your information can make Sycada services work better for you. For example, you can control whether to share location data and under which conditions.

If you would like us to stop collecting data from your journeys you can unlink the Beacon from your account in the app settings menu.

You may decide to terminate the use of our services of those provided by the parties to whom you have given permission to use your data. Once we receive your request, we then begin a process designed to safely and completely delete the data from our storage systems.

How does Sycada use aggregated information?

Sycada may use anonymous, statistical or aggregated information, in a form that does not enable the identification of a specific user, to properly operate the Services, to improve the quality of the Services, to enhance your experience, to create new services and features, including customized services, to change or cancel existing content or service, and for further internal, commercial and statistical purposes.

Cookies

Sycada may use cookies and similar technologies on the Services. Cookies are packets of information sent by the Website's servers to your web browser and then sent back by the browser each time it accesses the Website's servers.

Sycada may use cookies for various purposes, such as to save you the need to re-enter your username each time you log in, to facilitate the use of the Website, to collect statistical information, to verify information, and to customize the Website to your personal preferences and for information security purposes.

Some of the cookies may expire when the session ends and you exit your browser. Other cookies are saved on your device's hard drive. If you wish to block the Website's cookies, then please use the help button in your browser and follow the necessary instructions. However, bear in mind that disabling cookies may complicate or even prevent your use of the Website, or certain features thereof.

For more information visit our [Cookie Policy](#).

Information security

Sycada considers information security to be a top priority. Sycada services are built with strong security features that continuously protect your information. Sycada implements systems, applications and procedures to secure your personal information, to minimize the risk of theft, damage, loss of information, or unauthorized access or use of information. For example, we review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems. In addition, we restrict access to personal information to Sycada employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you.

Sycada operates according to ISO27001 standards for data security and privacy and is certified accordingly.

However, these measures are unable to provide absolute assurance. Therefore, although Sycada takes great efforts to protect your personal information, Sycada cannot guarantee and you cannot reasonably expect that Sycada databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Compliance & cooperation with regulators

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

European requirements:

European Union (EU) and United Kingdom (UK) data protection law applies to the processing of your information, we provide the controls described in this policy so you can exercise your right to request access to, update, remove, delete, and restrict the processing of your information.

Sycada strictly adheres to GDPR and any local implementations of privacy law applicable in countries where we provide or services.

We process your information for the purposes described in this policy, based on the following legal grounds:

With your consent

We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time.

When we're pursuing legitimate interests

We process your information for our legitimate interests and those of permitted third parties while applying appropriate safeguards that protect your privacy. This means that we process your information for things like:

- Providing, maintaining, and improving our services to meet the needs of our users
- Developing new services and features that are useful for our users
- Understanding how people use our services to ensure and improve the performance of our services
- Customizing our services to provide you with a better user experience
- Detecting, preventing, or otherwise addressing fraud, abuse, security, or technical issues with our services
- Protecting against harm to the rights, property or safety of Sycada, our users, or the public as required or permitted by law, including disclosing information to government authorities
- Performing research that improves our services for our users and benefits the public
- Fulfilling obligations to our partners like developers and rights holders
- Enforcing legal claims, including investigation of potential violations of applicable Terms of Service

When we're providing a service

We process your data to provide a service you've asked for under a contract (including our terms of use).

When we're complying with legal obligations

We'll process your data when we have a legal obligation to do so, for example, if we're responding to legal process or an enforceable governmental request.

If you have questions, you can contact Sycada and our data protection office at: privacy@sycada.com. And you can contact your local data protection authority if you have concerns regarding your rights under local law.

Changes to this Privacy Policy

Sycada may from time to time change the terms of this Privacy Policy. Substantial changes will take effect 30 days after Sycada has posted a:

- System message to users notifying them of changes to the Privacy Policy; and
- Notification on the Website's homepage or any other relevant web pages, explaining the changes to the Privacy Policy alongside a comparison of the "old" and "new" versions of the Privacy Policy.

Other changes will take effect 7 days after their initial posting on the Website. However, if Sycada amends this Privacy Policy to comply with legal requirements, the amendments will become effective immediately upon their initial posting, or as required.

You agree to be bound by any of the changes made in the terms of this Privacy Policy. Continuing to use the Services will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Services.

Last modified: 5 January 2022