

Supplemental California Consumer Privacy Act Privacy Policy

Effective as of: January 1, 2023

In this Supplemental California Consumer Privacy Act Privacy Policy ("**CCPA Privacy Policy**"), we, Geotab Inc., disclose information about our information practices as required by the California Consumer Privacy Act of 2018 ("**CCPA**") and supplement the disclosures in our other privacy notices. This CCPA Privacy Policy only applies to you if you reside in California. This CCPA Privacy Policy does not reflect our processing of California residents' personal information where an exception applies under the CCPA.

You can download a PDF version [here](#)

1. Our Personal Information Handling Practices over the Preceding 12 Months

We have set out below the categories of "personal information" and "sensitive personal information" (as defined by the CCPA) that we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected and the categories of third parties to whom we disclosed the personal information and the purposes of such disclosures. The table is followed by a description of the purposes for which we collected personal information. In this CCPA Privacy Policy, a "**consumer**" refers to a California resident, a "**user**" refers to a user of our website or other online services, a "**business contact**" refers to a representative of our prospective, current or past suppliers, customers or resellers, and an "**employee**" refers to a prospective, current or past employee or other personnel of ours. We did not "sell" or "share" personal information as the CCPA defines these terms over the preceding 12 months.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
General categories of "personal information" as defined under the CCPA		
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment,	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.

employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.		
Characteristics of protected classifications under California or federal law, including age, national origin, citizenship, marital status, sex (including gender, gender identity, gender expression), military or veteran status and nationality.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Biometric information.	No.	N/A
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Geolocation data.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them.

	behalf of our customers as service providers.	We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Audio, electronic, visual, thermal, olfactory, or similar information.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Professional or employment-related information.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).	Yes, from employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes, we drew inferences based on the personal information we collect (such as about employees) regarding their characteristics, behavior, attitudes, abilities and aptitudes.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Categories of “sensitive personal information” as defined by the CCPA		

A consumer's social security, driver's license, state identification card, or passport number.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
A consumer's precise geolocation.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.	Yes, from users and their employers or managers, business contacts, and employees. We also collect personal information from our customers and process the personal information on behalf of our customers as service providers.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.	Yes, from employees.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law

		enforcement agencies) to comply with the law.
A consumer's genetic data.	No.	N/A
The processing of biometric information for the purpose of uniquely identifying a consumer.	No.	N/A
Personal information collected and analyzed concerning a consumer's health.	Yes, from employees.	Yes, to our service providers and contractors (e.g., cloud hosting and internet service providers, and operating systems and platforms) to receive services from them. We also may have disclosed to government entities (including law enforcement agencies) to comply with the law.
Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.	No.	N/A

We used the personal information collected from **users** to create and manage user accounts on our products and services; communicate with users in relation to their account; provide users with assistance in connection with our products and services; help develop new products and services; provide, monitor, secure, customize and optimize the features of our products and services to users; respond to users' comments, questions and requests; provide periodic news and updates; process orders; engage in promotional efforts; and for any other purposes listed in our Notices at Collection to users.

We used the personal information collected from **business contacts** to place and receive orders; make and receive shipments; process transactions; manage supplier, customer and reseller relationships; receive and provide customer service; provide, maintain, improve and promote the services we provide to our customers and resellers; obtain purchase confirmations and invoices; send specific communications or respond to comments, questions and requests; provide periodic news and updates; engage in promotional efforts; and for any other purposes listed in our Notices at Collection to business contacts.

We used the personal information collected from **employees** to perform the services or provide the goods reasonably expected by our employees in their role as our employees, including those services and goods that are reasonably necessary for us to administer the employment relationship and for our employees to perform their duties; monitor, detect and respond to security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted information, including in or via our premises, computers, software, networks, communications devices, and other similar system; resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions; ensure the physical safety of natural persons; perform functions that are required under laws that apply to us; and for any other purposes listed in our Notices at Collection to employees.

We use the personal information we collect about **any California resident** for the following purposes:

- **Securing and Protecting Our Business:** Including to protect and secure our business operations, assets, online services, network and information and technology resources; to investigate, prevent, detect and take action regarding fraud, unauthorized access, situations involving potential threats to the rights or safety of any person or third party, or other unauthorized activities or misconduct;
- **Defending our Legal Rights:** Including to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect our rights or interests, including in the context of anticipated or actual litigation with third parties.
- **Auditing, Reporting, Corporate Governance, and Internal Operations:** Including relating to financial, tax and accounting audits; audits and assessments of our operations, privacy, security and financial controls, risk, and compliance with legal obligations; our general business, accounting, record keeping and legal functions; and related to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy or restructuring of all or part of our business.
- **Complying with Legal Obligations:** Including to comply with the law, our legal obligations and legal process, such as warrants, subpoenas, court orders, and regulatory or law enforcement requests.

We only use California residents' sensitive personal information for purposes referenced at Subsection 1798.121(a) of the CCPA. We do not have actual knowledge that we "sell" or "share" the personal information of minors under 16 years of age.

2. CCPA Rights

As a California resident, you have the following rights under the CCPA, subject to the conditions in the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- The **right to delete** personal information that we have collected from you.
- The **right to correct** inaccurate personal information that we maintain about you.
- The **right to opt-out of the sale or sharing** of your personal information by us. We do not "sell" or "share" personal information, as the CCPA defines these terms.
- The **right to limit** our use and disclosure of sensitive personal information to purposes specified at Subsection 1798.121(a) of the CCPA. We do not use or disclose sensitive personal information for purposes other than those specified at Subsection 1798.121(a) of the CCPA.
- The **right not to receive discriminatory treatment** by us for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

3. How to Exercise CCPA Rights or Contact Us

- **Methods of Submission and Instructions:** To submit a request to exercise your rights to know, delete or correct, please populate the web-form accessible [here](#), call our toll-free phone number **+1.800.397.7102** or submit an email request to privacy@geotab.com and include "California Request to [Know/Delete/Correct]" in the subject line. Clearly specify the nature of your request, including the personal information about you that you would like to know, the personal information about you that you would like to have deleted, or the personal information about you that you would like to have corrected.
- **Verification:** Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under "Authorized Agent" further below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information

to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfill your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.

- **Opt-Out Signals:** We do not “sell” or “share” personal information or use or disclose “sensitive personal information” for purposes outside of those referenced at subsection 1798.121(a) of the CCPA and therefore do not process opt-out signals.
- **Authorized Agents:** You can designate an authorized agent to make a request under the CCPA on your behalf if:
 - o The authorized agent is a natural person or a business entity and the agent provides proof that you gave the agent signed permission to submit the request; and
 - o You directly confirm with us that you provided the authorized agent with permission to submit the request.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

- **Contact Information:** If you have any questions about this CCPA Privacy Policy or if you want to exercise your privacy rights, please contact us at: Geotab Inc., 2440 Winston Park Dr., Attn: Legal (CCPA Request), Oakville, Ontario, Canada L6H 7V2, [legal @ geotab.com](mailto:legal@geotab.com).