

## PRIVACY POLICY

Fleetcx Technologies Private Limited (Fleetcx) has created this web site Privacy Policy in order to demonstrate that it is committed to implementing measures designed to protect the privacy of those using our services and accessing this website <https://www.fleetcx.io/>. This Privacy Policy is formulated in accordance with the Information Technology Act, 2000 (“**IT Act**”) read along with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**IT Rules**”).

The domain name <https://www.fleetcx.io/> (hereinafter referred to as “**Website**”) is owned by Fleetcx, a company incorporated under the Companies Act, 2013 with its registered office at V-27/15, DLF City Phase III, Gurgaon, Haryana, India - 122002.

It is clarified that “Fleetcx” shall include its affiliates and associate companies, directors, officers or employees. The following discloses our information gathering, usage and dissemination practices for the Website. By using or accessing the Website you hereby accept and consent to the terms of this Privacy Policy. Please note that our Website may contain links to websites of other organisations and when you access such external links, they may have different privacy policies specific to those websites. We encourage you to read all privacy policies posted on the websites that you visit. If you do not agree with any terms of this Privacy Policy, please do not use this Website or submit any personal information or sensitive personal information to Fleetcx.

Throughout this document, “we”, “us”, “our”, “ours” refer to Fleetcx. The terms “client”, “user”, “you”, “your” and “yourself” or similar terminology are all in use in reference to the individual user of this Website.

### 1. Information We May Collect

Fleetcx may collect (i) personally identifiable information like name, telephone number, e-mail address, etc.; (ii) personal information; and (iii) sensitive personal information. While you can browse some sections of our Website without requiring registration, certain activities (such as placing an order) or accessing certain areas of the Website shall require you to register. We may also maintain a record of your product interest and acquire information about you for our present and/or future affiliates.

The IT Act and the IT Rules define personal information as any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate is capable of identifying such person.

The IT Act and the IT Rules define sensitive personal data or information of a person as meaning such personal information which consists of information relating to: (i) password, (ii) financial information such as Bank accounts, debit or credit card, (iii) physical, psychological and mental health condition, (iv) sexual orientation, (v) medical records and history, (vi) biometric information, (vii) any detail relating to the above as provided to the body corporate for providing a service, and (viii) any of the information received under each of the heads by the body corporate for processing, or to be stored or processed under a lawful contract. Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of the IT Rules.

If you decide to purchase our products or avail our services, our third-party services providers may need to collect certain additional information, like your credit or debit card number and expiration date, bank routing and account number.

**Device Information.** When you are connected to our services via custom applications (apps), we may collect device-specific information such as your device model, operating system, unique device identifiers, and mobile network information. We may associate your unique device identifier or phone number with information that you may have used to register for certain services or purchase products. Server logs that are maintained by us or by our third-party service providers may contain information about the services that you have used, and your device-specific information. We may also maintain digital communication logs that track information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information. We may use your device’s IP address or MAC address to track device-event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

**Specialized Information.** We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. Certain services may include a unique application number in connection with the installation of apps. This number and information, including, without limitation, operating system type and app version number may be sent to our service providers when you install, update or uninstall apps. We may also collect and process information about your actual location.

At other times, Fleetx may collect information that cannot be used to identify you. For example, we may aggregate non-personal information about you and other customers who visit our Website. Aggregated information will not contain any information that can be linked directly back to you.

## **2. How We Collect Information**

Fleetx may use any number of tools to collect information about you, your computer access points, mobile devices, and the web browser that you use to connect to our Website or digital applications. For example, “cookies” are text files that we place on your computer or mobile device when you visit our Website. We may use cookies to personalize your interactions with our Website. You do not have to accept our cookies and you may set your browser to restrict their use and you may delete them after they have been placed on your computer or mobile devices. If you do not accept or delete our cookies, our Website may take more time to work, or may not function properly. Effective consent may be provided by using your browser settings, as long as you take positive action. Before using our Website, you are advised to check your current browser settings to ensure that the settings reflect your consent for Fleetx to place cookies on your devices.

Fleetx may also collect additional information from your web browser each time you visit our Website. We may collect information about the pages that you visit and the time spent on each web page or area of the Website, the promotions or advertisements that you click on, and other actions that you take while using our Website. This information may include your Internet Protocol (“IP”) address, the type of browser, the time that your browser was used to access our Website, and the referring web site’s address.

Our Internet service providers may also use other standard web-based technologies to analyze your movements while accessing our Website. The technologies include web “beacons,” “pixel tags,” and “clear gifs.” These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our Website, and help determine the best use for our Website’ content, and product and service offerings. Some of this information, including the IP address, may be stored on our Internet service provider’s server logs, and may be available for extended periods of time.

## **3. Choice**

Fleetx allows you to choose (opt out) whether your information is to be disclosed to a non-related third party for purposes other than Fleetx related communications, business or services. For sensitive personal information, e.g., financial information, Fleetx will give individuals the opportunity to explicitly (opt in) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Fleetx shall treat sensitive personal information received from an individual the same as the individual would treat it.

**For Users in India.** You have the right to withdraw your consent to the use, disclosure or transfer of your information. However, in such event we reserve the right to refuse or limit your access and use of our Website and any of their features, including the services offered by us. You also have the right to update or correct your information provided to us and the right to opt out of providing us information. You may exercise such rights by communicating the same to our Privacy/Grievance Officer using the contact details given in this Privacy Policy.

The information contained on our Website is for general information purposes only. While we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the Website or the information, products, services, or related graphics contained on our Website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website. Through this website you are able to link to other websites which

are not under the control of Fleetx. We have no control over the nature, content or availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

#### **4. Use and Disclosure of Your Personal Information**

At times Fleetx may use the services of independent companies to provide certain services to you, including, without limitation, website hosting services, credit card processing, product promotions, order processing and shipping services, and visitor surveys. Fleetx may share your personal information with the Internet service providers as appropriate under our business models. We do not share personally identifiable information with non-related third parties without your consent, except to the extent necessary to complete your request for products and services offered through our Website.

Fleetx may use your personal information to contact you via mail, e-mail, landline or mobile device in order to give you updates about Fleetx's special events, new services, payment confirmations, current information regarding our products, or other promotions that may be of interest to you. We also use return e-mail addresses to answer the e-mail we receive from you. Your e-mail address will not be shared with non-related third parties for use with their direct marketing programs, other than to comply with applicable laws. We may also use your IP address, or unique devices identification numbers to help protect Fleetx and our Internet service providers from fraud.

Additional uses of your non-personal and personal information will allow us to tailor products and services specific to your needs, to help organize and manage our relationship with you or your business, to conduct business, to provide you with customer and guest support, to perform functions that are described to you at the time of collection, and to enforce our Website's Terms. We reserve the right to provide non-personal identifying information, such as aggregate data, to third parties.

We may also use non-personal aggregate information to improve our Website. For example, our Internet Service providers may report to us that there were a particular number of visitors to a certain area of our Website, or that a certain number of businesses or a certain number of individuals completed our registration forms in particular areas of our Website. Such information may also be used to analyze the effectiveness of our business and advertising models.

We may share your information, including personal information and sensitive personal information among our subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors for processing, in order to provide you the best quality of services or for internal reasons, primarily for business and operational purposes. Such subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors may be located within or outside India.

Fleetx may also disclose your personal information as is necessary to: (a) comply with a subpoena or court order; (b) cooperate with law enforcement or other government agencies; (c) establish or exercise our legal rights; (d) protect the property or safety of our company and employees, contractors, vendors, suppliers, and customers; (e) defend against legal claims; (f) help with internal and external investigations; or (g) as otherwise required by law or permitted by law. We may disclose your information in connection with the sale or merger of a Fleetx or any transaction that involves the sale or assignment of some or all of our assets.

#### **5. Data Storage and Security**

Fleetx implements a variety of security measures to maintain the safety of your personal information when you place an order. Fleetx makes reasonable efforts to ensure that our Internet service providers have implemented physical, electronic, and procedural security measures to assist with safeguarding your personal information, and to help protect against unauthorized access and disclosure. Your information collected by us is stored on our systems in India and/or outside the territory of India, by us or our subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors. By providing information to us in any manner including accessing our Website, you consent to such storage of information as contemplated herein. Notwithstanding our efforts, the Internet has inherent security risks. Fleetx cannot promise, and you should not expect, that your personal information, personal searches, and other communications will always remain secure. You should take care with regard to how you handle and disclose your personal information or any username or password that you are required to use to access services on our Website.

## **6. Children and Data Collection**

Our Website is directed to be used by adults only and our Website's content is not directed toward collecting information from anyone who is under the age of 18 (eighteen). We do not knowingly collect personal information from children or minors. If Fleetx or its Internet service providers become aware that a child or minor has provided us with personal information without parental consent, that information will be deleted from our databases. If you have questions about personal information that may have been submitted by a child, please email us at [vineet@fleetx.io](mailto:vineet@fleetx.io) or you may also contact **Mr. Vineet Sharma, Director and CEO**, Privacy/Grievance Officer at **8860032458**.

## **7. Access to and Modification of the Information Collected**

The first time that you provide us with registration information through our Website, you may be offered the opportunity to subscribe to and receive additional information about our products and services. After your first use, you can change your initial choices by contacting our customer service e-mail at [vineet@fleetx.io](mailto:vineet@fleetx.io). Each commercial e-mail that we send to you will offer you the opportunity to opt-out of continuing to receive such messages. We may take up to 10 (ten) business days to process your opt-out requests. In some instances, we may have already shared your information with one of our authorized third parties before you changed your information preferences, and you may briefly continue to receive e-mail even after you have opted out. For any grievances related to the use of your personal information or sensitive personal information, you may contact us at:

Fleetx, Attn: **Mr. Vineet Sharma, Director and CEO, Privacy/Grievance Officer**  
Contact info: **8860032458**  
E-mail at [vineet@fleetx.io](mailto:vineet@fleetx.io)

## **8. Data Integrity**

Fleetx will only process personal information and sensitive personal information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by you.

## **9. Enforcement**

Fleetx uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, by our privacy principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints or disputes regarding the use and disclosure of personal information and sensitive personal information in accordance with the principles.

## **10. General Information and Privacy Support Contact**

Fleetx may update this Privacy Policy from time to time, and you should take the time to review it each time that you visit our Website. By using our Website or providing us with personal information or sensitive personal information after we update this Privacy Policy, you agree to this Privacy Policy as revised. Fleetx is committed to protecting your personal privacy. If you have questions or comments about our efforts to protect your personal privacy, or if you require additional information Fleetx's privacy commitment, please contact our Grievance Officer.