



SCS Connect System™ Software and Services Privacy Policy

Last modified: 11 October 2018

Introduction

Wellington Drive Technologies Limited respects your privacy and we are committed to protecting it through our compliance with this policy. This policy describes:

- The types of personal information that may be collected or that you may provide when you purchase, download, install, register, access or use any of the SCS Connect System™ fleet management mobile and desktop applications (the “**Software**”) provided or licensed by us.
- Our practices for collecting, using, maintaining, protecting and disclosing that personal information.
- How you can control the personal information collected by us on behalf of your Account Owner (as defined below).

This policy is to be read together with our SCS Connect System™ Terms of Use, available at <http://www.wdtl.com/legal> which governs your use of the Software.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register or use any Software. By downloading, registering or using any Software you agree to this privacy policy.

This policy may change from time to time (see “Changes to our Privacy Policy” below). Your continued use of any Software after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Account Owners and Your Relationship with Them

As a user of the Software, it is important that you understand the status of Account Owners and their relationship to you and your personal information. An “**Account Owner**” is defined in the SCS Connect System™ Terms of Use, available at <http://www.wdtl.com/legal>. However, in summary, Account Owners are the manufacturers, owners or managers of the fleets of equipment which the Software is intended to help manage, and are Wellington’s customers for SCS Connect System™ services. They are the entities that control the collection of the information and the purposes and means of the processing of that information.

We make the SCS Connect System™ Software and services available to the Account Owners, and facilitate access to the Software by Account Users (as defined below). We only act in the capacity of a “processor” of information collected by the Account Owners (or collected by us on behalf of Account Owners).

You may have been specifically authorized by one or more Account Owners to access services associated with their account, i.e. to connect with equipment in that Account Owner’s fleet and collect, view, and edit information associated with that fleet. Alternatively, you may have been permitted to download the Software in order that you can access services associated with an SCS Connect System™ account an Account Owner has with us. In either case, this makes you an “**Account User**” as defined in the SCS Connect System™ Terms of Use. It is likely that your Account Owner will be your employer, a customer of your employer, or a supplier to you or your employer.

If you are an Account User, under the SCS Connect System™ Terms of Use you have agreed that we may share all your personal information held by us with Account Owners associated with you, and treat that information as if it belonged to them.

Information Collected by the SCS Connect System™ and How It is Collected

Account Owners may collect personal information from you in the course of you using the Software and related SCS Connect System™ services. We collect this information on behalf of Account Owners, i.e. as their “agent”, although it is also available to us.

Personal information collected by the SCS Connect System™ may include:

- Any personal information which you provide to, or is collected from you by, your Account Owner and which is provided to us by them.
- The name and email address associated with your user ID.
- The locations, times, and periods during which you are in proximity to an SCS Connect System™ -enabled appliance.
- The locations, times and information of any promotional Coupon that you may have scanned with SCS Connect System™ App.
- Unique serial numbers and model identifiers associated with the device(s) on which you use the Software.
- The time and date of your last login to any Software which requires you to login.
- Any personal information which you choose to enter into the text and image fields available in the Software.

Account Owners are able to create new User IDs, which may involve entering your name and email address and other information into the SCS Connect System™ database. We do not control this process.

How We Use Your Information

As described in the SCS Connect System™ Terms of Use, we do not control an Account Owner’s use of your personal information and take no responsibility for the actions of any Account Owner. To understand your Account Owner’s use of your personal information and the Account Owner’s privacy policies, please contact them directly.

We use information that is collected about you, including any personal information, to:

- Provide the Software and related SCS Connect System™ services to Account Owners.
- Enable the primary asset tracking and equipment fleet performance monitoring functionality of the Software.
- Provide information to the Account Owner(s) associated with you, including about the location of equipment that uses our SCS Connect System™.
- Validate and redeem digital promotional coupons.
- Improve our products and services, including the Software and related SCS Connect System™ services.
- Notify you when Software updates are available.
- Contact you where you have provided the information for that purpose.

Also, in jurisdictions which allow it, Account Owners may use the personal information for other purposes including tracking your activities.

The arrangements we have agreed with the Account Owner may include the transfer and storage of your personal information indefinitely, including in a cloud database managed by a third party, which may be outside the country in which you or we are located. It may also be cached locally on your device until uploaded to the database. It may also be processed by staff operating outside the country in which you or we are located who work for us or for one of our suppliers. By submitting your personal information, you

agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy.

Disclosure of Your Information

We may disclose aggregated information about users of our SCS Connect System™ and information that does not identify any individual or device, without restriction. In addition, we may disclose personal information that is collected from you in the course of you using the Software and related SCS Connect System™ services:

- To Account Owners associated with you (if any).
- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our SCS Connect System™ business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us or by the Account Owner(s) associated with you when you provide the information.
- With your consent.
- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the SCS Connect System™ Terms of Use.
- If we reasonably believe disclosure is necessary or appropriate to protect any of our rights, property, or safety or those of our customers or others.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets provided that such buyer or successor complies with this policy.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information provided to us is stored on our secure servers behind firewalls or in encrypted third-party databases, except for short term caching as described above.

The safety and security of your information also depends on you. Where we or your Account Owner have given you (or where you have chosen) a password for access to certain Software, you are responsible for keeping this password confidential. We ask you not to share your password with anyone, and to let your Account Owner know when you believe your security or privacy has been breached.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Software. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Your Control of Your Information

You may avoid the collection of personal information by your Account Owner through the use of our Software by not using the Software, and you can terminate the continued collection of it permanently by removing the Software from your device. You may also terminate the location tracking functions temporarily by removing the Software's location services permissions on your phone, by turning off Bluetooth, or by setting operating time windows within the Software (where available). Note, however, that

opting out of the Software's collection of location information may cause its location-based features to be disabled.

By accepting the SCS Connect System™ Terms of Use, you have agreed that we may treat your personal information as belonging to your Account Owner. We will therefore only provide you with details of your personal information or remove your personal information from our database if instructed to do so by your Account Owner, and if you wish to view your personal information or have it deleted from our database you should contact your Account Owner.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this web page.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

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