



S5i's Privacy Policy

WELCOME

Welcome to S5i's Privacy Policy, which we will simply refer to as "the Policy". When you use the services of, or interact with, S5i or one of S5i's related entities, we collect your information, including personal details. We appreciate that you trust us with this information and we want to always keep that trust. We will start by making sure you understand what information we collect about you, why we collect it, how it is used and processed, when we may need to share it with persons other than yourself, and the choices you may have regarding your personal information.

IMPORTANT

We want to make it as straight forward as possible for you to understand our privacy practices. So we are keeping it simple and transparent. We hope this will help you make informed decisions when you share your personal information with us.

But before we get to the detail:

- This Policy, of course, applies when you are a S5i customer and have a contract with us. But even if you are not an S5i customer, this Policy applies to any personal information we collect when you use our services or interact with us. This could include instances where you use our services that your employer or contractor pays for, you contact us directly, you propose to supply services to us, you register online to receive information about our services or you apply for a job with us.
- If you are a S5i customer, this Policy forms part of the S5i terms applicable to the S5i products and services you've signed up to receive from us.
- You may choose not to supply us with your personal information, but this may impact on our ability to provide you with our products and services, or to have meaningful interactions with you.
- We are committed to processing personal information consistent with the requirements of all applicable laws.
- As things change, and technology changes, we may need to update our Privacy Policy from time to time. We'll keep you updated by publishing these changes on our website www.s5i.tech. You may want to check back here from time to time to make sure you're always up to date with our Privacy Policy. If we make material changes to the Policy, where possible we'll notify you as required by applicable laws. We will also update the version and date below to indicate when those changes will become effective.

Please contact dayne@s5i.nz if you have any questions about this Policy.



THE POLICY

1. So, who are “we”?

We are S5i. We provide tyre software solutions to the tyre and transport industries including telematic and TPMS services.

2. And, who are “you”?

You may be our:

- Customer – a person or an entity that has entered into a customer contract with us (including an owner operated business);
- End User – someone authorised by a Customer to use our services, for example you could be an administrative user or a fleet manager in our Customer’s business;
- Driver – you may be employed by a Customer to drive a vehicle that has our devices installed in it; or you may have installed our devices in your vehicle(s) and are using them (and the associated services) in your capacity as an independent contractor for our Customer;
- Visitor – you may have accessed and used one of our websites, including the careers section of our website; or
- Supplier – you may be supplying us with your products or services or looking to enter into a supply arrangement with us.

3. What information about you do we collect?

We only collect your personal information that is necessary for the purposes of our functions and activities. There are two key categories of information we collect about you: your user information and your usage information.

3.1 Your User Information

To provide you with our services and conduct our business, we need to collect some information directly from you and sometimes from third parties. We may collect the following user information:

A. Information you give us

This is personal information we collect from you when you sign up for an S5i service, enter a competition or give us your information for another reason. It includes your:

- identification information, including your name, age or date of birth and gender;
- other identity verification information, including your driver licence number, a copy of your driver licence, copies of other identification documents, your employment history (if you are applying for a job at S5i and similar);
- contact information, including your mailing or street address, email address, telephone number and other contact details;
- payment information, like your bank account details;
- any preferences you have submitted, including preferred username and other preferences related to the preference settings for your use of the S5i services;
- information you have shared with us in calls and online chats with our staff, or any emails and other written information you’ve sent us or that you’ve chosen to input into the services. We record our contact centre calls and live chats to help improve our customer service;
- vehicle information, including vehicle make, model, year of manufacture and the licence plate number;
- comments you make on any feature of our services, including information you provide to us through customer surveys;



- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- details about your business and your role within your business; and
- in addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether to make you an offer of employment or engage you under a contract.

B. Information our Customer may give us

If you are employed by or are contracted to provide services to one of our Customers (e.g. if you are a Driver or an End User), we may collect personal information about you from that Customer. If you are our Customer, and you want to share or otherwise allow S5i to collect, create and use personal information related to your employees, contractors and other individuals (e.g. Drivers or End Users), you must:

- obtain permission from such individuals to allow S5i to do this; and
- take reasonable steps to ensure that these individuals understand what personal information we will collect, create and use and that they agree to this. For example, you can do this by providing these individuals with a copy of this Policy, putting notices on your vehicles that the vehicles are equipped with GPS tracking devices and ensuring your own privacy policies include a detailed explanation of what personal information is going to be collected and created by S5i, who will have access to it and how S5i and you intend to use this information.

Also, as a Customer you decide who will have access to the products and services you acquire from us, including personal information we collect. If you want to authorise someone else to access your S5i services account (e.g. by becoming an End User), we'll collect their name and contact information from you. Please make sure you have this person's consent before you share their information with us. Subject to legal requirements, if you are an End User, Driver or an individual who interacts with a Customer, then you will be directed to contact the Customer in the first instance for assistance with any requests or questions relating to your personal information collected and stored by S5i.

C. Information we may collect from other third parties

This is personal information we collect about you from other people, like credit reference agencies. We only do this if we reasonably believe you've authorised us to do so, or if you've authorised the third party to share your information with us. This information could include:

- your credit history;
- collated information we purchase from third parties that may relate to identifiable individuals. We will only collect this kind of data from trusted providers if we are satisfied they have permission to share this information with us and the collection, use and disclosure meets the requirements of the relevant privacy legislation and regulation; and information we may collect from third party partners where we have consent to do so for the provision of any S5i partnership offerings.



D. Information we create to manage our Customer's account

We also create and hold information to manage our Customer's S5i services account, including:

- quote number and account name;
- service connection and disconnection dates;
- information on the products and services Customers have agreed to purchase from us, including information on any products and services a Customer used to purchase from us;
- our Customer's billing information and payment records; and
- any login and password that we may assign to our Customers for use with our services.

3.2 Your Usage Information

When you use our products and services, we may automatically generate and collect personal information related to your use of such products and services, including the following:

A. Vehicle and driver information

S5i devices that are installed in our Customers' vehicles continuously track, collect and obtain data such as:

- vehicle speed, location, distances travelled and route of vehicle movement;
- whether ignition is on or off, acceleration, braking or lateral movements;
- vehicle weight;
- refuelling of vehicle;
- whether a vehicle has been in an incident;
- vehicle odometer readings; and
- data about the tyres on the vehicles, including pressure, temperature and tread depth.

D. S5i mobile and web applications ("Apps")

We may collect personal information from users of our Apps (e.g. End Users or Drivers). For example, Drivers can log the vehicle they are driving each day into the App. We may also collect information that mobile device sends when an App is being used, like a device identifier, user settings and the operating system of the device, as well as data about the use of the App. An App may access the applicable mobile device's GPS coordinates or course location of the device, thereby causing us to collect and store data about the location of the user of the App.

E. Your Online Data

We may also collect personal information about you when you use and access S5i websites or any other website operated by us. For example, which parts of the S5i website you visit, the time and date of your visit, the internet protocol address assigned to your computer, your geo-location information, and standard web log information.



4. How do we collect your personal information?

Apart from through direct contact with you and our Customers (e.g. via email, telephone or face-to-face conversations), we collect your personal information in the following ways:

4.1 Automatically when you use our products and services

From time to time the S5i may offer integration products or services, where we integrate our offering with a third-party service provider's offering. We may collect your personal information where we supply our Customer with such product or service.

From time to time we may also add, and you may choose to, subscribe to other products and services we introduce to the market. When this happens, we may collect your personal information when you use that product or service.

4.2 When you visit our website or interact with us online

A. Interactive features.

We may offer interactive features such as chat or messaging services on the box, forums, and social media pages. We, and other individuals who use these interactive features, may collect the information that is submitted or made available through such features. Any information shared on the public forums or social media pages may be seen by anyone, including third parties that do not adhere to our Policy.

B. Cookies.

We may also use 'cookies' or other similar tracking technologies on our website and services that help us track your use of the websites and services and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You may be able to disable cookies through your internet browser but allowing us to collect cookies ensures that the S5i websites and services work as intended.

C. Beacons.

"Web Beacons" (also known as Web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that we include on the S5i websites for several purposes, including to deliver or communicate with cookies, to track and measure the performance of those features, and to monitor how many visitors use those features. We may also include Web Beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

D. Log Data.

Our servers automatically record certain data about how users use our products and services (we refer to this data as "Log Data"), including End Users, Drivers and other non-registered users. Log Data may include data such as a user's internet protocol (IP) address, browser type, operating system, the web page that a user was visiting, the pages or features of our product or service to which a user browsed and the time spent on those pages or features, search terms, the links that a user clicked on and other statistics. We use Log Data to analyse (and we may engage third parties to analyse) Log Data to improve, customize and enhance our products and services by expanding their features and functionality and tailoring them to users' needs and preferences. S5i may use a person's IP address to generate aggregate, non-identifying information data about how our products and services are used.

E. Third party analytics.

We use Google Analytics platform to help us understand how our Customers, Drivers, End Users and other users use and interact with our products and services. You can read about how Google uses any data that it collects here –



www.google.com/policies/privacy/partners/. If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout>.

5. How do we use or process your personal information?

We use or process your personal information to:

5.1 provide you with our products and services

We collect your personal information to enable you to access and use all aspects of our products and services (including our websites and applications). In doing so we may need to use your personal information so that we can:

- contact and communicate with you, and help you when you have a problem;
- process your payments;
- provide you with information about our products and services and the products and services of our trusted partners; and
- send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you.

5.2 secure and improve our products and services

Being able to identify how you are using our products and services plays a big part in helping us to make them better. In doing so, we may need to use your personal information so that we can:

- operate, protect, and optimise our current products, services, business and users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- innovate, develop and improve current and new products and services, including for machine learning purposes where our products and services utilise Artificial Intelligence ("AI").
- find out and analyse what you think of our products and services;
- secure and protect our systems and platforms. This includes managing, improving and monitoring their operation, security and integrity. It also includes preventing attacks against, and threats to, their security or integrity; and
- detect and prevent attacks against our systems and platforms, and threats to their security or integrity.

5.3 communicate with you

In addition to communicating with you in relation to your use of our products and services, we may also communicate with you to:

- let you know of any changes that might affect the products or service; and
- send you marketing and promotional messages and other information that we think may be of interest to you, including information sent by, or on behalf of, our carefully selected and trusted business partners that we think you may find interesting and this includes direct marketing. If you do not want to receive marketing offers by email or in hard copy, please opt out by following the steps set out in paragraph 8.2.

5.4 improve our dealings with you

We may use your personal information to:

- administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and



- comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

5.5 conduct credit checks and recover debts

We rely on you to be able to pay your invoices on time. As such, we may use your personal information to assess your ability to pay or recover money you owe us, including by sharing your personal information with third parties for this purpose.

5.6 investigate fraud

We may use your personal information to enhance our fraud prevention and detection controls.

5.7 assist in our decision on whether to make you an offer of employment, engage you under a contract or otherwise do business with you

We may use your personal information such as your employment history, your other experiences and references to assess your suitability for a job and determine whether to make you an offer of employment, engage you under a contract or otherwise do business with you.

5.8 de-identify or aggregate data for analytics purposes

Sometimes we de-identify or aggregate your personal information and use it for S5i's internal purposes, reporting industry-specific statistics and trends, reporting to government organisations or for sharing with third parties. We may receive consideration from third parties for such services. We do this in accordance with the relevant S5i terms or a separate agreement you or the Customer may have agreed to with us.

5.9 provide you with our products and services that utilise Artificial Intelligence (AI)

The provision of S5i's products and services may also include the use of AI to process your information. Certain S5i products and services utilise AI, specifically machine learning, to analyse driver and vehicle data, helping to enhance safety and sustainability outcomes. While AI technology offers significant benefits, it is not infallible. Any inaccuracies in AI-generated data may be raised by customers with S5i and S5i may use that information to correct its machine learning models. Any data collected, used, processed and held for AI purposes is handled securely in compliance with the privacy laws and S5i's standard data handling practices as outlined in this policy.

5.10 for other purposes about which we obtain your consent.

From time to time, we may obtain your consent to use your personal information for other purposes not listed here. We will always endeavour to let you know in as much detail as possible what data we intend to use and for what purpose.

6. Who may we need to share with or disclose your personal information to?

While we endeavour to limit what personal information we disclose and to whom, in certain circumstances we may share or disclose your personal information to other entities for the purposes listed below. What information we share and why depends on a specific situation. For example, we may share your personal information:

6.1 with Suppliers

We may engage third-party Suppliers to work with us to administer and provide our products and services to Customers. For example, we work with reliable cloud data centre suppliers to store personal information and other data we collect. We also work with payment card industry (PCI) compliant service providers to assist with processing of credit card payments. with Customers. If your employer is also our Customer, and you use our products and services in the course of your employment, all information we collect or obtain



about you will also be available to the Customer (i.e. your employer). As may be covered in more detail in the Customer's own privacy policy, upon the Customer obtaining all necessary consents, the Customer may use your personal information for:

- scheduling and monitoring servicing of vehicles and tyres;
- monitoring fuel usage and efficiency of vehicles;
- monitoring vehicles to ensure they are being used in a safe and lawful manner;
- monitoring driver behaviour to ensure they are driving in a safe and lawful manner;
- monitoring the location of vehicles and the distance, location and speed that the vehicle has travelled at; and
- for legal, insurance, and driver training purposes.

Please contact your employer directly if you need more information on how your employer (i.e. our Customer) uses this information.

Artificial Intelligence (“AI”)

For products/services utilising AI, S5i may share data with third party suppliers for AI learning purposes essential to the delivery of our products/services, including sharing data with service providers outside the jurisdiction where the data was originally collected. Strict controls are in place around the use, transmission, processing, storage and retention of data for AI learning purposes.

6.2 with advertising partners

When you visit the S5i websites, S5i may allow third-party partners to set 'cookies' or other similar tracking technologies (as described in paragraph 4.2B above) to collect information regarding your activities and your devices (e.g. your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for the purposes of delivering personalised advertisements to you when you visit third party services within their network. This practice is commonly referred to as “interest-based advertising” or “personalised advertising”. In some cases, we may engage in “cross-device tracking” which allows your browsing activity to be tracked across different websites on different devices or apps. If you prefer not to share your personal information with third party advertising partners, you may opt out by following instructions set out in paragraph 8.2.

6.3 in connection with business transactions

If S5i is acquired by a third party as a result of a transaction such as a merger, acquisition or asset sale or if S5i's assets are acquired by a third party in the event S5i goes out of business or enters bankruptcy, some or all of your personal information may be disclosed or transferred to a third party acquirer in connection with the transaction. This is because information S5i collects about you may be considered a business asset.

6.4 to meet our legal obligations

To comply with our legal obligations, we may share your personal information and other data with the Government (including regulatory authorities), law enforcement agencies or private parties. However, we will only do so if we reasonably believe it is necessary or appropriate in order to:

- respond to claims or orders, pursuant to legal process (including subpoenas, summons, discovery or disclosure order or compulsory production orders);
- to protect S5i's property, rights and safety and the property, rights and safety of a third party or the public in general; and
- to stop any activity that S5i considers is illegal, unethical or legally actionable activity.



7. What about storage and security?

We are responsible for storing confidential commercial records, including personal information of Drivers and End Users on behalf of our Customers. Consequently, we implement processes and measures to maintain a high standard of quality and system security, and reliability. We use several physical, administrative, personnel, legal and technical measures to protect your personal information.

7.1 Where we store your personal information

Our products and services have been designed from ground up to be secure. We partner with a global Internet network provider and a global cloud data services provider to enable secure transmission, storage and processing of any collected data (including personal information). We store all data collected with Amazon Web Services (AWS) and Alibaba Cloud (Alibaba) We chose AWS and Alibaba because we believe they are the safest options for your data (including personal information).

7.2 How long do we store your information for?

Subject to any applicable laws, we store your personal information for as long as necessary to fulfil the purpose(s) for which it was collected, including to support our products and services we offer, resolve disputes, establish legal defences, conduct audits, pursue our legitimate business purposes, enforce our agreements and comply with applicable law.

7.3 Keeping your personal information secure

Our products and services use a private network to connect directly to our cloud platform for the transmission of data. We regularly conduct independent security testing and our policies and procedures are aligned to internationally accepted control objectives and practices for security. Please be aware, however, that no method of transmitting data over the Internet or storing data is completely secure. Accordingly, S5i cannot guarantee the absolute security of any personal information.

7.4 Third party services

Our websites and applications may contain links to websites and services operated by third parties. Those links are provided for your convenience only and may not remain current or be maintained. We have no control over the privacy practices of, or any content on, those linked websites and services, and we are not responsible for those websites and services. The privacy policies that apply to those other websites and services may differ substantially from our Policy, so we encourage you to read them before using those websites. Visiting these other websites and services is at your own risk.

8. Your choices

8.1 You are able to access and correct your personal information

If we hold personal information about you, you are able to request access to such personal information. Please contact us by using the details set out in paragraph 11 below. Before processing your request, we may contact you to verify your identity and to advise you of any charges that may apply. If you think that any personal information we hold is wrong, please contact us – we will check the information and, if we agree it is wrong, we will take reasonable steps to ensure that it is corrected. Sometimes, we may not be able to provide you with access to all your personal information. Where this is the case, we will tell you why.

8.2 Opting out

A. General.

You may have the right to opt out of certain uses of your personal information. If you choose to opt out, we may be unable to supply our products and services to you.



B. Email Communications.

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding the products and services you have requested. We may also send you certain non-promotional communications regarding us and our products and services, and you will not be able to opt out of those communications (e.g. communications regarding a change to our service or updates to this Policy).

C. Mobile Devices.

We or our third party providers may send you push notifications through the S5i mobile applications. With your consent, we may also collect geolocation information when you use S5i mobile application. You may be able to opt-out of this collection by changing the settings on your mobile device, however this could impact on our ability to supply you with services.

D. Cookies and Personalised Advertising.

If you would like to opt-out of the Cookies and other similar tracking technologies we use, you may do so by blocking, disabling, or deleting them as your browser or device permits. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalised advertisements on some mobile applications by following the instructions for Android and iOS. The online advertising industry also provides websites from which you may opt-out of receiving targeted ads from advertisers that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at the following addresses:

www.networkadvertising.org/managing/opt_out.asp

<http://www.youronlinechoices.eu/>

www.aboutads.info/choices/

Please note you must separately opt out in each browser and on each device.

E. “Do Not Track”. Do Not Track (“DNT”)

DNT is a privacy preference that users can set in certain web browsers. Please note that we do not respond to, or honour, DNT signals or similar mechanisms transmitted by web browsers.

8.3 The complaints process

If you think we have breached the relevant privacy legislation or regulations, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.



11. Contact Us

For further information about this Policy or our privacy practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

S5i Technology

The CEO
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