

Geotab Data and Analytics Policy Statement

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Introduction

This Geotab Data and Analytics Policy Statement (referred to hereunder as the “Policy” or “Statement”) provides an overview of the data and analytics practices that Geotab Inc. (“Geotab” or “we” or “Company” and which includes reference to Geotab’s wholly-owned subsidiaries and affiliates) has implemented on a risk prioritized basis. By itself, this Policy shall not create any rights or entitlements for anyone. If Geotab and its Customers incorporate this Policy by reference into a contract, then the parties’ rights and obligations shall be determined based on such contract.

Permitted Use

This Statement may only be used for your internal purposes in connection with Geotab’s products and services. This Statement undergoes frequent updates. Unless this Statement forms part of your or your organization’s contractual arrangements with Geotab, it should not be copied or duplicated without the express written permission from Geotab.

Questions or Feedback

Please direct your questions, feedback or any other information to legal@geotab.com.

Revision History

Version	Date	Editor	Changes	Approved By
1.5	May 27, 2020	V. Nicole Godin	Public version created	Mike Branch
1.6	September 15, 2022	Kenzie Gregory	Updates to reflect new Geotab technology	Mike Branch

Geotab Data and Analytics Policy Statement

Introduction

On an enterprise-wide basis, Geotab uses advanced analytics tools to support Geotab Customers ("Customers"), improve its service offerings and develop new products and services for Customers with Aggregate, statistical and other analytical information. The use of Data Analytics in the world of telematics and the transportation industry is important to the development of new insights that can greatly support the advancements in public interest, safety, business efficiency and productivity, reduce greenhouse gasses, help advance autonomous vehicles and smart cities. By harnessing the power of data from a massive installed base, Geotab is able to bring new insights to its Customers, the marketplace, and enable innovation in a variety of fields.

As part of its core telematics product and service offering, Geotab processes, aggregates and analyzes data on behalf, and in the interest of, its current and potential Customers to innovate and advance their business and/or operational interests. In addition, Data Analytics is an integral part of how Geotab may assess product performance, quality assurance and enhancement viability, security, and improvement of the overall Customer experience. Geotab is committed to managing its Data Analytics operations carefully and in a manner that meets prescribed legal and regulatory obligations as well as its overall business needs.

Accordingly, the purpose of this Policy document is to transparently outline the organization's Data Analytics practices and the performance of responsible Data Analytics activities in the interest of its current and potential Customers.

Geotab understands that as its control environment evolves, so too will this Policy and its requirements evolve to meet business, operational and Customer needs, as well as legal, regulatory and contractual obligations related to its Data Analytics practices. As such, this Policy defines the essential risk-based principles for Data and analytics processes at Geotab.

Data Science and Analytics

We extract vehicle data using the Geotab device and aggregate it through Google's BigQuery (GBQ) enterprise data warehouse. Aggregated data sets made available by Geotab do not contain Personal Data and cannot reasonably be used to identify an individual. Information processed using GBQ is carried out on servers located in the European Economic Area (EEA) or the United States (US). For more information on Geotab's data science and analytics solutions, click [here](#).

Data De-identification for Data Science, Analytics and Benchmarking Purposes

All Data and Analytics products or services are required to adhere to the following data de-identification requirements, where these data outputs are not deemed for benchmarking analytics use-cases (see specific requirements below for this use-case):

1. **Customer Instructions** - Data source types captured by Geotab GO Devices or third party devices are based on Customer instruction and requirements as set out in the Geotab End User

Agreement.

2. **Excluded Location(s)** - Excluded geographic locations shall be excluded in all instances where insights are to be derived from analytics processing activities as per organizational policy and/or Customer instruction.
3. **Aggregate(d) Data** is data that is gathered and expressed in a summary form.
4. **Aggregation of Data** - Analytical Insights and/or Work Products shall comprise Aggregated Data.
5. **Anonymized Data/Data Anonymization** - A type of information sanitization whose intent is privacy protection. It is the process of either encrypting or removing personal data from datasets, so that people whom the data describes remain anonymous. Anonymization is a technical process that converts clear text data into a non-human readable and irreversible form, including preimage resistant hashes (e.g., one-way hashes) and encryption techniques in which the decryption key has been discarded. Data Anonymization enables the transfer of information across a boundary, such as between two departments within an agency or between two agencies, while reducing the risk of unintended disclosure, and in certain environments in a manner that enables evaluation and analytics post-anonymization.
6. **Anonymity of Customers** - Customers that comprise the benchmark group shall never be externally published or communicated (or made publicly available) unless written authorization is otherwise received from participating entities.
7. **Data Analytics** - Data analytics is the process of extracting meaning from Raw Data using specialized computer systems. These systems transform, organize, and model the data to draw conclusions and identify patterns.
8. **Data Re-identification Risk Determination** - Anonymized and Aggregated Data that is made available externally or publicly shall be evaluated for data reidentification risk, and where necessary subject to Motivated Intruder Attack (MIA) testing in a manner consistent with the requirements in this Policy.
9. **Number of Customers/Vehicles** - An aggregated analytics data group shall, at minimum, meet Geotab's internal data aggregation and anonymization procedural requirements that are audited and assessed for alignment with leading industry practice and effectiveness on a routine basis.
10. **Aggregated Geographic Views** - Any geographic data produced and/or processed for analytical insights shall be executed in a deidentified manner as deemed acceptable for the purposes of protecting vehicle and customer anonymity on a case by case basis.

Data Aggregation

Aggregated Data is data that is gathered and expressed in a summary form. For example, the average of a series of data points is Aggregated Data. Other examples include sums, minimums, maximums, etc. Geotab's Data Analytics can be aggregated in several different ways, none of which can lead back to an individual Customer or vehicle. Geotab creates datasets with Aggregated Data on behalf of its Customers and prospective Customers to provide and improve Geotab's products and services and create new products and services. Geotab conducts a range of investigations to ensure data utility is proportional to privacy and confidentiality protections based on the use case. To determine the appropriate data transformations to address risks of reidentification, Geotab considers the exact data that is being handled, the purpose for collection and processing, and the goal of the data analysis.

Please refer to Geotab's Data Analytics Products and Services below for an outline of how data is produced for each of our product offerings.

Use Cases

Geotab uses Data Analytics to improve and enhance its product offering to its Customers and to create new data products and offerings in a manner that preserves Customers' data privacy, trade secrets, confidential information and data security.

Geotab's current and future use cases may include:

- Benchmarking
- Derivative data products
- Provision of software applications related to safety and productivity
- Provision of products that improve the MyGeotab experience for the Customer

Unless otherwise authorized to do so by the Geotab Data Risk Committee and/or express Customer instruction, Geotab's use cases shall prevent inclusion of the following information that may infer or construe:

- Anti-competitive behaviour
- Deemed adverse to Customer interests
- Unethical use, processing or disclosure
- Identification of a particular vehicle or driver
- Identification of a particular Customer
- Any case that involves malicious intent
- Any case in violation of applicable law

Benchmarking

Benchmarking allows Geotab Customers to evaluate their operational performance against the performance of similar fleets in order to identify gaps. By understanding where these gaps reside, the Customer is then able to tailor solutions to improve its performance. Example areas where benchmarking is used include fuel economy, asset utilization, and safety.

It is important to understand that all benchmarks published by Geotab are a result of Geotab's benchmarking methodology, technology and Data Analytics infrastructure. For example, the manner in which Geotab collects and reports fuel economy benchmarks may differ from other industry organizations; however, the mechanism is consistent across all data stored in Geotab's Data Analytics infrastructure and Geotab makes descriptions of the methodology available alongside the benchmark.

Benchmark Groups

In order to benchmark a fleet, there shall exist a basis for comparison as part of the established Data Analytics framework designed and implemented at Geotab. This foundational basis for comparison is important because the fleet must be compared against similar fleets or groups of vehicles from one or more angles (i.e. fleet size, composition, driving pattern, etc.) and allows Geotab to formulate a benchmark group in relation to its Data Analytics calculations, work products and models.

In order to preserve the anonymity and privacy of our Customers, Geotab shall establish a series of metrics that establishes and monitors the manner in which Customer Data shall be used as a basis for comparative assessment and evaluative purposes.

Active Insights

Active Insights leverages the data collected by GO Devices to provide insight back to Customers based on a pool of aggregated data to support fleet optimization. Using these aggregated data, Customers can also compare their metrics to other Benchmark Groups.

Predictive Maintenance

The goal of Predictive Maintenance is to prevent on-road failures and enable easier cost savings for fleet managers by providing predictive management tools. Fault-based projects leverage the diagnostic trouble

codes to assist in activities such as scheduled maintenance, vehicle safety and warranty management. Status-based projects infer the health of the engine to assist in detection of early warning signs of mechanical failure.

Policy Exceptions Management

If all of the above do not hold true for a benchmark group, then that benchmark is not computed and will not be available for viewing by a Customer.

The aforementioned benchmarking group and data aggregation requirements are to be implemented on a risk-prioritized basis over the regular course of business for Geotab's Data Analytics activities. Where exceptions may arise they are to be reviewed jointly by the VP, Data Analytics, and where risk impacts are deemed significant by the Executive Data Risk Committee, on a case-by-case basis.

Quality Assurance

For each published benchmark, Geotab incorporates metrics that serve to validate the benchmark on an on-going basis. Geotab looks for unusual patterns that may indicate data anomalies and may rectify benchmarks as appropriate.

Transportation Analytics

Geotab's Transportation Analytics is a series of datasets that are drawn from anonymized and aggregated device data. Geotab's Transportation Analytics have a broad scope of insights that can help Customers with traffic corridor analysis through to economic development forecasting, with the goal to achieve roadway efficiency and safety.

The raw data that forms Transportation Analytics undergoes a series of transformations to ensure that personal identifiers are scrubbed from the data. Once transformations are complete, the data is aggregated to ensure the data is never traceable back to an individual Customer or vehicle. The frequency with which these datasets are updated is dependent on the nature of the data.

Use Cases

Some examples of Transportation Analytics include:

- Intersection Insight (traffic flow, wait times, etc.)
- Road Impediment Data (potholes, road quality, etc.)
- Stop Analytics (curbside parking, last mile delivery and identifying potential locations for rest stops for truck drivers and electric vehicle charging stations)
- Origin and Destination Analytics (examine popular routes from ports and associated travel-time metrics and dwell times to understand potential freight bottlenecks)

Quality Assurance

Each Intelligence Dataset is monitored via a series of scripts that check the data being published for consistency in an effort to identify any anomalies. These monitors are published as dashboards that are reviewed by Geotab's Data Analytics team.

Data Access and Security

Geotab implements access management controls for all Data Analytics activities and outputs in a manner consistent with the organization's *Technical and Organization Measures Statement (TOMS)* and in alignment with Customer instructions and exceptions. For access to the TOMS, click [here](#).

Access to Geotab's Data Analytics platform by Customers is provided primarily via Geotab's Data Analytics API.

Data Analytics API

Geotab Customers shall be granted access to their respective Customer databases through the MyGeotab APIs. These same APIs and credentials shall be used to connect to a series of standard Data Analytics services. These comprise specific Data Analytics methods that will return various Aggregated Data dependent on the method call. For example, there exists a method to return the fuel economy benchmark according to fleets that are similar to the fleet of the Customer making the request.

Altitude APIs

The Altitude platform is built off of APIs with which partners can integrate and create their own insight-driven applications.

its.geotab.com

Geotab's Intelligent Transportation Systems (ITS) platform, Altitude, is a transportation analytics platform that provides public and private entities with actionable real world data insights to support safe, efficient and sustainable usage of roadways. Altitude serves public and private entities by providing aggregate contextualized information about when, where and why traffic is moving about their areas of interest. Altitude can be leveraged to support large scale efforts such as state freight plans and infrastructure projects, but is also capable of helping municipalities with efficient curbside usage and safer roadways. Additionally, Altitude is also being used to help inform the needs of electrification infrastructure on corridors of interest, assisting grid operators in preparedness for more vehicles electrifying, and private companies in real estate site selection.

For further detail related to Altitude, please refer to the following [link](#) for additional guidance and to review its.geotab.com's Terms and Conditions.

Data Sharing

Geotab shall always contractually prohibit Customers from re-identifying Aggregate or pseudonymized data that Geotab provides to the Customer.

Geotab does not share analytics information that Customers can use to re-identify drivers, Customers or other Data Subjects, except with respect to data that a particular Customer provided to Geotab.

Important Disclaimer

This Policy is subject to change and update. By itself, this Policy does not create binding obligations or liability towards Geotab, its Customers or Geotab's resellers, end users or any other party. For further information on the purpose of this document, see the Introduction. This document is not intended to be

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