Product Privacy Notice

Application

This Product Privacy Notice ("**Notice**") applies only to those instances where, with respect to personal data collected from you, Geotab Inc. (together with its affiliates, collectively, "**Geotab**" or "**we**", "**our**") is the "**processor**" and does **not** apply where Geotab is a "controller" of personal data or to the privacy practices of any third party under any circumstances. This Notice applies to all Geotab entities except where a Geotab affiliate has published its own separate privacy policy.

As used in this Notice, the terms "**controller**" and "**processor**" have the definitions given to those terms in the Applicable Data Privacy Law, including, but not limited to the GDPR, UK GDPR, LGPD, and the CCPA/CPRA (as defined below) and "**personal data**" means any information that relates to an identified or identifiable individual or as otherwise defined by an Applicable Data Privacy Law. "**Applicable Data Privacy Law**" means all data protection and privacy laws, regulations and binding guidance in any jurisdiction where Personal Data is processed under this Policy, including, without limitation, the EU General Data Protection Regulation ("**GDPR**"), UK General Data Protection Regulation ("**UK GDPR**"), Brazil's General Data Protection Law ("**LGPD**"), California's California Consumer Privacy Act ("**CCPA**")/California Privacy Rights Act ("**CPRA**"), and any local equivalents, as amended or replaced. The concepts of "controller" and "processor" are analogous to the concepts of "business" and "service provider", respectively, under the CCPA and other Applicable Data Privacy Law that use similar terminology.

Geotab is a "processor" where it *processes* personal data on behalf of end users of the Geotab Solution (as defined below). The end user of the Geotab Solution is the controller with respect to such personal data. Accordingly, if you are looking for information about the privacy practices of the controller (which may, for example, be your employer if they are an end user of the Geotab Solution or your customer if you are a reseller of the Geotab Solution), please refer to the relevant controller's privacy policy.

Geotab is a "controller" with respect to personal data collected from you if Geotab determines the purpose(s) for which that personal data is collected and the means for which it is used. If you are looking for information about Geotab's privacy practices where it is the controller or our contact information for privacy purposes, please refer to Geotab's Privacy Policy.

Geotab Solution

Geotab's core solution consists of a software platform and a telematics device that, together, enable Geotab customers to collect and analyze vehicle data to better manage their fleets. Other devices may be connected to the telematics device through physical or wireless means to provide data from other sources within the vehicle, or used independently in the case of asset trackers and other equipment. For the purposes of this Notice, Geotab branded products and services are collectively referred to as the "**Geotab Solution**".

"**Fleet Data**" means data generated and processed by Geotab in connection with a vehicle or other asset that you drive or otherwise use, in addition to any other data that an end use of the Geotab Solution chooses to input into the Geotab Solution, which may include information about the location of the applicable hardware, the vehicle or other asset in which it is installed or used (including the surrounding environment) or, potentially, personal data about you to the extent the relevant controller provides such personal data to Geotab. Geotab claims no ownership of Fleet Data and processes it only in accordance with our Customer's written instructions as generally outlined in this Notice.

GEOTAB
management by measurement

Collection and Processing of Personal Data

In its capacity as a processor, Geotab processes certain personal data collected in connection with the use of the Geotab Solution at the instruction of the Geotab customer (the data controller) as outlined below.

Means	Description	What Personal Data Does Geotab Process?	How Does Geotab Use the Personal Data?
MyGeotab	Web-based fleet management software platform available to Geotab customers, enabling the management of Fleet Data. Includes modules and add-ons such as Geotab Public Works and Geotab Keyless.	Fleet Data provided by the data controller, which may constitute or include personal data, such as the following (depending on the specific products used): • VIN; • License plate number; • Driver name; • Approximate or precise location data;; • Video device footage; and • Audio and/or sound recordings. In addition, the customer's representative must set up a MyGeotab account and provide Geotab with certain personal data such as name, address, phone number and email address.	Provide, maintain and improve the Geotab Solution, including account creation and access.
MyAdmin	Web-based software platform used to support the Geotab Solution by allowing customers and partners to place orders, organize devices for end users, administer rate plans, open and update support tickets, provide training material and resources, handle RMAs, and otherwise use the Geotab Solution.	The customer or partner representative must set up a MyAdmin account and provide Geotab with certain personal data such as name, address, phone number, email address. Order information submitted by the partner representative to Geotab which may include personal data such as customer name, address and VIN.	Provide, maintain and improve MyAdmin, including account creation and access, the processing of transactions, obtain purchase confirmations and invoices and to send reseller specific communications, or to respond to comments, questions, and requests or distribute information pertaining to the Geotab Solution.
Geotab Drive	Mobile application primarily used to streamline ELD compliance, inspection, driver identification and more. Includes add-ons such as Geotab Keyless.	Driver name and certain vehicle information that could constitute personal data if used in combination with other data, such as licence plate number, VIN and odometer.	Provide, maintain and improve the application, including account creation and access.
Inosat Navigator	Mobile application used by drivers to receive work orders, navigate to	Driver name, username, and driver ID for authentication and identification; Approximate or	Provide, maintain and improve the application, including user authentication

	destinations, communicate with dispatchers, and enable real-time location tracking for fleet management purposes.	precise location data (including GPS coordinates, speed, heading, and timestamps) collected continuously; Device identifiers (such as device ID and push notification tokens); Service/work order data (including client names, addresses, contact information, and scheduled times); Photos, digital signatures, and scanned barcodes for service documentation; In-app text communications between driver and dispatcher; Device telemetry (battery level, network type, OS version, app version).	and access; Enable real-time vehicle tracking and route history; Facilitate job dispatch, navigation, and service completion documentation; Enable operational coordination through in-app messaging; Troubleshoot and ensure reliable app operation.
Inquiries & Support	Responding to your inquiries and providing support services if you contact Geotab directly.	If you contact us via the "Contact Us" form on the Geotab webpage or other means, you may be requested to provide certain personal data such as your name, email address, phone number and job title.	Responding to your inquiry.

Geotab may also use personal data for any other purpose for which we have obtained instructions from the relevant data controller or as otherwise required by Applicable Data Privacy Law.

Interaction with AI Systems

Geotab employs or may in the future employ data systems, software, hardware, applications, tools, or utilities that operate in whole or in part using artificial intelligence (collectively, "**AI Systems**") to assist in providing support services and to enhance the functionality and usability of our products. These AI Systems may leverage advanced AI systems capable of generating content (which is new or novel), rather than simply analyzing or acting on existing data (i.e. "generative" AI).

When you engage with an AI System, we may use your personal data as follows:

- **Data Processing and Improvement**: We may collect and process your personal data to enhance the performance, accuracy, and functionality of our AI Systems, provided that we will not use, and will not permit any third party to use, personal data to train or develop generalized AI models.
- **User Interaction and Support**: When you engage with our AI-powered chatbot, we may use your personal data to understand your inquiries and provide accurate, helpful responses. This may involve analyzing your interactions to improve user experience and support services.
- **Anonymization and Aggregation**: Personal data collected through your interactions with our AI Systems may be anonymized and aggregated for analytical purposes. This helps us understand usage patterns and improve our services without identifying individual users.
- **Security and Fraud Prevention**: We may use personal data processed by our AI Systems to detect and prevent security threats, fraudulent activities, and other malicious behavior.

Geotab may also process your personal data using AI Systems to develop driver based insights such as driver safety scores based on driving habits, to detect collisions or to detect distracted driving events, among other insights. It is important to know that this processing is often automated, sometimes without human involvement when the data or insights are initially generated and presented to the data controller. The data controller is responsible for deciding how this data is used, including ensuring, where required by applicable law, that decisions made based on such data and insights involve human oversight.

Any personal data processed by an AI System is handled in accordance with our broader privacy practices, as outlined in this Policy. Geotab is broadly committed to responsible AI, being the development, deployment, supply and use of AI Systems in a way that upholds the principles of trustworthiness, accountability, and equity through the AI lifecycle and value chain. In particular:

- **Data Privacy and Security**: We prioritize the protection of your personal data. All personal data processed by our AI Systems are handled in accordance with Applicable Data Privacy Law and Geotab's internal data governance policies as outlined in this Policy.

- **Transparency and Accountability**: We are transparent about how our AI Systems function and the types of data they process. Our AI development processes include rigorous testing and validation to ensure accuracy, fairness, and non-discrimination.

- **Ethical AI Practices**: Our commitment to ethical AI includes ongoing assessments to prevent bias and ensure that our AI systems operate fairly and impartially. We adhere to industry standards and best practices in AI ethics, continuously monitoring and updating our AI models to mitigate any potential risks.

- **Continuous Improvement**: We are dedicated to the continuous improvement of our AI Systems. This includes regular reviews, updates, and the incorporation of user feedback to enhance the performance and reliability of our AI technologies.

Third-Party AI Provider Safety Retention

Geotab uses AI Systems that are operated by third-party AI providers as part of its internal tooling or to support the delivery of the Geotab Solution. Those providers may, as part of their own trust and safety practices, temporarily retain inputs submitted to their systems for a limited period. This retention is conducted primarily for safety and abuse-prevention purposes, such as detecting harmful or policy-violating content, and is not used to train or improve the underlying AI models. Such retention is a function of the third-party provider's safety infrastructure and is not within Geotab's control. In most cases, inputs are not retained beyond 30 days. Any such temporary retention is subject to the relevant provider's own data handling commitments and applicable law.

Data Analytics

When processing Fleet Data, Geotab compiles, stores and uses aggregated data, system usage information and elements of Fleet Data from which it is not reasonably possible to identify data subjects (collectively, "**Analytic Data**") in accordance with the Geotab Data Analytics Policy. The Analytic Data that Geotab uses in this manner is not Fleet Data and does not contain personal data. Geotab will not attempt to disaggregate the Analytic Data or re-associate it with a specific vehicle or driver without consent from Geotab's customer, unless legally compelled to do so or unless required for safety or troubleshooting purposes.

Biometric Information Collected or Captured by the Geotab Solution

Geotab may process Fleet Data that constitutes biometric information (as defined under applicable law) of the end user's personnel if and to the extent the end user chooses to enable particular functionality

available on certain video telematics devices. Geotab does not control how an end user uses biometric information relating to end user personnel and does not access such information except where necessary to provide and support the Geotab Solution in accordance with the Geotab End User Agreement. **Where an end user enables the collection or capture of biometric information, the end user is solely responsible for determining the purpose and use of the biometric information in accordance with applicable law.**

Third Parties

For the avoidance of doubt, this Notice does not apply to the collection, use or processing of your personal data by third parties. For example, you may install and engage with third-party add-ons through your use of the MyGeotab platform. This Notice does not apply to those add-ons or any other third-party content or functionality you engage with in connection with your use of the Geotab Solution. Geotab recommends that you review the privacy policies and statements of any third-parties to properly understand their information practices.

In addition, if you acquire, subscribe to, or download an application advertised on Geotab Marketplace or otherwise use any third party product or service integration with the Geotab Solution, please refer to the privacy documentation and practices of the applicable Marketplace Partner or third party integrator. By using any Geotab Marketplace application or third party integrator solution, you acknowledge that your personal data may be processed and/or stored outside of the Geotab environment by the applicable third party and, accordingly, Geotab does not warrant or endorse, nor does it assume or will have any liability or responsibility for the data handling, storage or security practices of Marketplace partners or third party integrators.

Geotab may engage third-party service providers to process personal data on its behalf ("**Subprocessors**"). Subprocessors are selected based on their ability to provide the necessary safeguards and security measures to protect personal data in compliance with Applicable Data Privacy Law. Before engaging any Subprocessor, Geotab conducts a thorough assessment to ensure they comply with Applicable Data Privacy Law. We maintain an updated list of Subprocessors and their functions, which is available upon request. Geotab ensures that any Subprocessor it engages only processes personal data in line with Geotab's documented instructions and implements appropriate technical and organizational measures to ensure the security of personal data.

Legal Basis for Processing and Disclosure of Personal Data

The relevant data controller is responsible for ensuring it has a legal basis for collecting and processing your personal data. Geotab processes your personal data to provide the Geotab Solution to the relevant data controller in accordance with their instructions and legal obligations.

International Transfers of Data

Geotab primarily stores personal data on servers located in North America, Europe and Asia, but may also utilize servers located in other regions from time to time for load balancing and other purposes. Accordingly, your personal data may be transferred to a country where the data protection laws do not provide a level of protection equivalent to the laws in your jurisdiction. However, when Geotab transfers your personal data, we do so in compliance with Applicable Data Privacy Law by ensuring your personal data is afforded an adequate level of protection using the following means, where appropriate:

- where possible, transferring personal data to countries that the relevant Data Protection Authority ("**DPA**"), including, but not limited to, the European Commission has deemed to provide an adequate level of data protection;

- in cases where personal data is transferred to countries without an adequacy decision, we use standard contractual clauses approved by the relevant DPA and each Applicable Data Privacy Law to ensure that your personal data is afforded a level of protection comparable to that provided within the Applicable Data Privacy Law;

- implementing appropriate physical, technical and organizational security measures to protect personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing; and

- taking other measures to provide an adequate level of data protection in accordance with applicable law.

Data Retention

Geotab customers control how long personal data, and Fleet Data generally, is retained as part of their use of the Geotab Solution. All new Geotab Solution databases have a default purge frequency set to 2 years, however customers have the ability to adjust these settings to suit their organization's needs. Otherwise, Geotab will retain your personal data for as long as we are instructed to do so by the relevant data controller and will delete or anonymize your personal data in compliance with Applicable Data Privacy Law. Geotab may initiate a purge when it is required to preserve the integrity, reliability and availability of the Geotab Solution. If a purge is performed by Geotab, Geotab will retain a minimum 365 days of data prior to the purge date and will provide you with advance notice. If it is no longer reasonably possible to delete your personal data because, for example, it has been archived, Geotab will securely store the personal data and isolate it from further processing until deletion or anonymization is possible.

The end user explicitly acknowledges and agrees that, if it adjusts the retention period in the Geotab Solution to retain Fleet Data, including Fleet Data that constitutes biometric information, for a longer timeframe, it must only do so in compliance with applicable laws.

Data Security

Geotab maintains reasonable technical and organizational security and data storage policies and measures for facilities within its control in accordance with the Geotab Technical and Organizational Data Security Measures Statement, as amended by Geotab from time to time, to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Rights and How to Exercise Them

Under Applicable Data Privacy Law, you have certain rights regarding your personal data. Please contact the relevant data controller if you wish to exercise those rights. Geotab is committed to respecting and facilitating these rights and will provide reasonable assistance to the relevant data controller in responding to any data subject request to the extent required by law or our contractual commitments with the data controller.

Supplemental Disclosures for Certain Regions

Data protection laws in certain jurisdictions require Geotab to make additional disclosures. You can find these additional disclosures in the Geotab Supplementary Privacy Disclosure Document.

Geotab does not sell your personal information for monetary compensation. However, privacy laws, including California Privacy Laws, the Colorado Privacy Act, the Virginia Consumer Data Protection Act,

the Connecticut Data Privacy Act, the Utah Consumer Privacy Act and the Nevada Privacy Law broadly define "sale" to include other types of data sharing, such as sharing personal information with third parties in exchange for valuable consideration (for example, the use of third-party advertising cookies). For more information, please refer to our Cookie Policy.

We do not sell the personal information of minors under 16 years of age without affirmative authorization. Geotab does not collect, and therefore does not use, disclose, sell or share, any “sensitive personal information” as defined by California Privacy Laws in its capacity as a controller.

Changes to This Notice

If Geotab makes any changes to this Notice, we will post an updated policy on our website. You should periodically review the Geotab webpage for any updates. The updated Notice will become effective as of the date stated in the Notice.

English Version Controls

Non-English translations of the Notice, if any, are provided for convenience only. If any ambiguity or conflict exists between such other translations, this English version will be held as the authoritative version. Translations of this Notice into language in which we offer our products and services can be provided upon request.

Document Revision History

Version	Date	Editor	Changes	Approved by
1.0	July 27, 2025	Legal / Privacy	Document created	Legal / Privacy
1.1	February 20, 2026	Legal	Adding Inosat Navigator	Legal
1.2	July 3, 2026	Legal	Clarifying updates to “Interaction With AI Systems” and added new section: “Third-Party AI Provider Safety Retention”	Legal