



PRIVACY POLICY

MASTERCOM Limited and its Cartrack subsidiaries (collectively “Cartrack”, “we” or “us”) recognize your rights to privacy and are committed to protecting and controlling the use of your personal information, in accordance with the regulatory requirements of the jurisdictions in which we operate. This privacy policy applies to all MASTERCOM Limited and Cartrack mobile applications and Cartrack Development Team applications (“Application”) [including, but not limited to MASTERCOM TRACKING, PROTRACK Android app, PROTRACK Apple app, Driver Authentication App, PROTRACK 365, Vehicle and Fleet Management, Telematics PRO, ITRYBRANDS, MASTERCOM LIMITED], which are designed to be used in conjunction with the MASTERCOM Tracking and Fleet Management web-based application. It governs how we and our service providers (Appendix A) or Partners (Appendix B) collect, store, use, disclose and share your personal information when you use the Application.

PURPOSE AND LEGAL BASIS

We collect and process your personal information when providing you with the Application services, in the performance of our contract with you or the organization that acts as your data controller. We may also process your personal information to comply with legal obligations that may apply.

THE INFORMATION THAT WE COLLECT

We and our service providers may collect the following personal information, depending on the specific Application, to provide you with the services and features of the Application:

- **User Information:** Your name, which identifies you as a user in the Application

- **Device information:** This can include IP address, microphone information, CPU status, memory status, battery status, system version, phone model, phone signal level, received signal strength indicator (RSSI), network type, user attributes and channel attributes.
- **Call content:** Audio data generated during calls (Voice, Cartrack Driver App)
- **Call information:** Information relating to the date, time and duration of calls, as well as the name of the person that you contacted or the person that contacted you (Voice, Cartrack Driver App)
- **Location information:** Your precise location is used to determine your speed and location which may be required for various fleet management and driver safety and support functions. Your location may also be used to determine your proximity to the nearest vehicle dealership or approved value-added service provider.
- **Call Logs:** Server logs generated by our service providers when placing calls on their network (Voice, Cartrack Driver App)

HOW WE SHARE YOUR INFORMATION

We do not share your personal information with third parties, other than as specifically set out below

Service Providers: We may disclose your personal information to approved service providers (Appendix A) where they perform services on our behalf. The service providers are prohibited from using your personal information for any purposes other than providing the requested services and are bound by applicable data protection policies limiting their use of the personal information.

Partners: We may provide your personal information to business partners who contractually engage with us to provide dedicated application services (Appendix B). These business partners are the data controllers and have their own data protection policies relating to their use of personal information.

Affiliates: We may share your personal information with MASTERCOM subsidiaries and affiliates whose use is subject to this Privacy Policy.

Legally Required: We may disclose your personal information if we are required to comply with applicable data privacy laws or regulations.

HOW WE SECURE YOUR INFORMATION

The security of your personal information is important to us and we take care to ensure that we and our service providers implement appropriate technical and organizational measures to prevent unauthorized access, use, disclosure, destruction or loss of your personal information.

This is done in compliance with the requirements of applicable data privacy laws and regulations and in conformance with industry standards and practices.

HOW LONG WE RETAIN YOUR INFORMATION

We will retain your personal information for as long as is necessary to provide the Application services. In some cases, retention may occur for longer periods, especially when applicable law so requires.

YOUR RIGHTS

Data protection and privacy laws, depending on your jurisdiction, grant you certain rights in relation to your personal information. These rights may include:

- Requesting information about how we use your personal information
- Reviewing and accessing your personal information that we hold
- Rectifying inaccurate or incomplete personal information that we hold concerning you
- Obtaining that we erase your personal information, subject to legal or legitimate grounds for retaining the personal information
- Withdrawing your consent for us to process your personal information
- Objecting to us processing your personal information, when such processing is based on legitimate interest
- Lodging a complaint with a data protection authority
- Requesting the transfer of your personal information to another entity

If you wish to submit a request to exercise your rights, please send an email to info@mastercom.co.ke or support@mastercom.co.ke

In the event that your personal information has been provided to us by a data controller, we will work with the data controller to process your request.

Please be aware that withdrawing consent or choosing to delete your personal information may result in certain services in the Application not being available to you.

INTERNATIONAL TRANSFERS

We may subcontract processing to, or share your personal information with, third parties located in countries other than your home country. Your personal information may therefore be subject to privacy laws that are different from those in your country of residence.

In such instances we shall ensure that the transfer of your personal information is carried out in accordance with applicable privacy laws and that appropriate contractual, technical, and organizational measures are in place. This includes the use of standard contractual clauses approved by the East African Community.

CHILDREN

The Application service is not directed to children under the age of 18 years and we do not knowingly collect personal information from children under 18 years of age. In order to request the deletion of personal information relating to a child under the age of 18 years, please contact us at the address provided below and we will take reasonable measures to promptly delete such personal information from our records.

CONTACT US

If you have any questions regarding this Privacy Policy, please contact us at info@mastercom.co.ke or support@mastercom.co.ke

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time, so please re-visit our website and social media handles periodically.

In the event that we make any substantial changes to this Privacy Policy, that materially change how we treat your personal information, we will endeavor to provide you with reasonable notification regarding these changes, as required by applicable law.

The changes to this Privacy Policy will become effective as of the date listed in the “Last Updated” heading at the top of this Privacy Policy.

4th January, 2024