

Privacy Notice

Ituran Location and Control Ltd (**'We'** or **'Ituran'**) values your privacy and wishes to let you know how it handles personal information.

What does Ituran do?

We support our Distributors and Business Customers, processing fleet driver's telematics data.

We are acting as Data Processors, which means we do not set and determine the purposes of the processing but operate under the instruction of our clients – the Data Controllers (**"The Services"**).

Children

The Services are not directed to individuals under 18. As Ituran only processes data that is transmitted into the systems by the fleet manager, and mostly processed automatically, Ituran does not knowingly collect or process personal information from individuals under the age of 18.

If you are a hold parental responsibility over an individual under 18 and believe your child has provided personal information to Ituran, please contact the relevant fleet manager, if needed.

What kind of information we collect?

1. In General, through our Services and Products, installed and operated in car fleets, we collect information regarding the performance of the car itself, and information regarding specific car-rides (such as speed, brakes, turns, road-bumps, engine and fuel, etc.). The Information is provided to the fleet managers under their instruction and request and is visible to them regularly. To us, the information mostly does not identify you specifically and personally, unless we are provided with direct identifying data by the Data Controller.
2. If you are an active driver in a fleet that uses our services, including any of our products, the information collected is generally divided into three groups:
 1. Raw diagnostic information: Speed, engine status, battery status, car location and track, car category, etc.
 2. Processed information: Information deduced from the Raw information – sudden brakes, sharp turns, swift acceleration, etc.
 3. Maneuvers and driving status: Analysis of the processed data, generally has two mark – A. Aggressive. B. Dangerous.
3. If you are a system user, such as a car fleet manager, or a Business customer, we may collect the following information:
 1. Contact details – such as your name, position, telephone and e-mail address.
 2. Automatic-Passive information and meta-data, such as IP address, operating system, user/device id, geographic location information and type of device used.

Additional mobile and marketing considerations

If you have opted-in to receive text or e-mail messages from one of our Business Customers, you may opt-out by following the opt-out instructions it has provided, or by contacting the Business Customer.

How do we collect information?

We collect information about you when you engage with our Business Customer, and while using or driving a car from a fleet that uses our Services and Products.

Business Customer and system user – we collect the information any time you communicate with us or use our systems.

You don't have to provide any of the above-mentioned information, but it is important to understand that without it – we will not be able to provide our services, in part or in full.

How do we use the information collected?

We use the information to provide our Services to our Business Customers and fleet managers. Basically, if you use a car from a car fleet using our Services, a Business Customer of ours or a fleet manager, we use the information we collect on behalf of, and as directed by it, to monitor and collect information from the car while it is being used, analyze the information and deliver insights regarding the fleet, the car, and the car and driver's driving behavior to it.

Eventually, we may store information for legal compliance purposes, such as tax authorities demands or legal defense, or process the information in a way which will not identify you directly, as anonymous or aggregative information, to improve our services and future products – all under our legitimate interests.

Retention

We may retain your information for the period consistent with the purpose of the collection, as instructed by our Business Customer. Technical and Diagnostic data will be retained for 7 years, unless considered anonymous (then it may be retained longer).

We may also retain your information as needed to pursue our individual purposes under our legitimate interests, as described above.

Sharing of information collected

We may share information, as follows:

For legal reasons

We may share your information if we reasonably believe that:

- (i) It is necessary to comply with a legal process or inquiry (such as a court order, subpoena, or search warrant, etc.) or any other legal requirements of any competent authority;
- (ii) It would potentially mitigate our liability in an actual or potential lawsuit or claim;
- (iii) It is necessary to investigate and prevent unauthorized uses of the system, our Services, fleet cars, or other illegal activities;

- (iv) If it is in someone's vital interest, such as on life-threatening situations.

Service providers

We use a limited number of third-party service providers, who act as our sub-processors, to assist us in making our Services available. For example, we may share data with third parties who provide services to us, such as, analytics, and data storage services. These third parties may access, process or store personal data while providing their services to us.

Affiliates and Partners

We may share information that will not identify you personally, such as information collected through, statistical information, aggregated information, etc., with our affiliates, subsidiaries, parent companies, partners or other affiliates of us, in order to deliver and improve the Services.

How can I review or receive a copy of my information, or withdraw my consent to the processing of my personal data?

We operate as processors on behalf of our Business Customers and fleet managers. For any inquiry relating to your Data Subject Rights, you may approach them directly.

International Transfers

We may transfer, store, and process information about you on servers and databases located outside of your country of residence, which could have different data protection rules than those of your country of resident or the country in which you were located when you initially provided the information.

When we transfer information on EU individuals outside the EEA, we conform with applicable regulations.

Miscellaneous

We recommend that you review this privacy notice periodically, as we may update it from time to time. The use of our Services constitutes your acknowledgment of the up-to-date privacy notice.

We are not responsible for and do not control the privacy practices of any of our Business Customers. We encourage you to review their privacy practices as-well. We welcome your feedback on our privacy practices, please send any comments or questions to sherut@ituran.com.