



Last update: [September 26, 2019]

PRIVACY AND SECURITY POLICY

At Astus, we are mindful of the personal information we ask from you and the personal information that you provide about yourself as a part of our services.

Astus is committed to protecting the confidentiality and security of personal information. This Privacy Policy (the "Policy") describes how we collect, use and disclose personal information, and how it may be reviewed and amended as necessary.

This Policy also explains how TÉMOINS DE NAVIGATION or cookies are used on our Platforms .

By accessing, visiting or using any of our Platforms or any other related mobile application, communicating with us or agreeing to receive emails from Astus, you agree to the terms and conditions of this Policy.

This Policy applies to the information we collect about you when you use our platforms, including:

- Our Website (www.astus.com) and associated landing pages
- Our mobile applications
- Our Astus FMS application and web services

(collectively referred to as the "Platforms.")

This Policy does not apply to websites operated by third parties, which are governed by their own privacy policies, procedures or practices, if any, and Astus is therefore not responsible for them.

1. The Information We Collect

We only collect information about you if we have a reason to do so, for example, to provide you with our services, to communicate with you or to improve our services.

We collect this information in two ways: if and when you provide us with information and automatically in the course of performing our services. Let's review the information we collect.

The Information You Provide Us With

The amount and type of information depends on the context and how we use it. Here are some examples:

Basic information about your account: we need basic information to set up your account. For example, we ask your manager or people who open an "Astus" account to provide us with a username and email address. You can give us more information such as postal address, postal code, but this information is not necessary to create an "Astus" account.

In addition, depending on your needs, you may also provide us with certain personal information about your employees and store it in our FMS (Fleet Management System) application, such as their telephone number, driver's license and other information if you wish and with their prior consent.

- **Contacting us:** You can also provide us with information when you complete our surveys, discuss a technical support question with our employees or subscribe to our newsletter. When you communicate with us via the form, by email, telephone, through our "Zendesk" customer support system or by any other means, we keep a copy of the communications.

The information We Automatically Collect

We also collect certain information automatically:

- **Login information:** Like most online service providers, we collect information that web browsers, mobile devices and servers usually provide, such as browser type, IP address, unique device IDs, language choices, access date and time, operating system and mobile network information.

Our Platforms also uses usage analytics or cookies. These are files that are installed on your computer's hard drive or web browser to collect information, such as your language preference, browsing history and browser type and version, in order to enhance your experience on our Platforms. We use usage analytics or cookies to compile aggregate data on site traffic and interactions with the site in order to improve the experience and tools available on our site.

These usage analytics or cookies cannot be used to retrieve personal information. When you first visit our website, you will be notified that a cookie may be placed in your device's browser. You may refuse to install a cookie, ask to be notified before it is installed or disable one. However, disabling cookies on your browser may affect your experience while browsing the website.

The user can also object to any location request by managing the settings of the device from which he or she accesses the website.

- **Usage information:** we collect information about your use of our services. For example, we collect information about the actions taken by users on our Platforms. We also collect information about what happens when you use our Fleet Management System (FMS) application for example steps taken to get the data you wanted or error messages. This information is used primarily to provide you with technical support services and to improve our solutions.

We also collect data when you use our "PUSH/PULL" web services, including your IP address, the date, time and duration of the data extraction activity and the information you have viewed.

We may also use other industry-standard technologies, such as pixel tags, to track your use of our website. Pixel labels are graphic images embedded in a number of pages of our website or emails, which allow us to determine whether or not you have taken any particular actions. When you connect to one of these pages, open an email or click on a link in an email, the pixel tags record this action. Pixel labels allow us to measure and improve the way we measure the presence and interest of visitors to our website and evaluate the effectiveness of our services.

The main legal basis for the processing of personal information is that we need the information to provide our Platforms, and it serves our legitimate interests, which are explained in more detail in the section entitled "Use and Disclosure of Information." We also reserve the right to process your personal information with your consent, which we will request from you when appropriate.

2. Use and Disclosure of Information

We take steps to ensure that only the employees who need to access your personal information in the course of their duties have access to it. We use and disclose your personal information primarily for the following purposes:

- to maintain, improve and offer all the features of our FMS application, to provide the services and information you request, to respond to comments and questions, and to provide technical support to users of our application;
- to understand and analyze the usage patterns and preferences of our users, improve our website and our products and services, and create new products and services and new features and functionality; and
- to send you communications to the extent permitted by applicable laws.

When we disclose your personal information to third parties, we take reasonable steps to ensure that the rules set out in this Policy are followed, and we require that such third parties provide us with sufficient assurances that appropriate technical and organizational measures are in place. Astus does not sell its list of subscribers or customers to any organization or company or communicate it to anyone.

3. Retention of Information

Your personal information is stored and processed on our servers hosted in a Tier III certified data center in Canada, compliant with the SSAE16 SOC 2 standard.

For our customers outside of Canada, the processing of information is subject to the laws of the country in which it is located and the information may be disclosed to the governments, courts, law enforcement or regulatory agencies of that country in accordance with such laws. However, our practices regarding your personal information remain at all times governed by this Policy and, where applicable, we comply with the requirements of the General Data Protection Regulation ("GDPR") by providing an adequate level of protection for the transfer of personal information between the EU and Canada or another third country.

Astus has implemented several physical, administrative and technical safeguards to protect the privacy and security of the personal information we process: for example, a small locked padlock appearing in the browser window and the URL address beginning with "https://" rather than "http://" tell you that the page on which you conduct your transactions is protected by the SSL protocol. However, no security measures are absolute or fully guaranteed.

Astus retains your personal information for as long as necessary for the purposes described in this Policy; if necessary to comply with our legal obligations, resolve disputes and perform contracts with our customers or partners; or to the extent permitted by applicable laws.

4. Rights Regarding Personal Information

Upon written request and presentation of proof of identity, you may access the personal information we hold about you and, if necessary, request corrections to be made, as authorized or required by law. However, to ensure that the personal information we hold about you is accurate and up to date, please notify us promptly of any changes.

You may have other rights under the GDPR, including

- a) the right to withdraw your consent to the processing of data if such data processing is based on consent;
- b) the right of access to your personal information and certain additional information, subject to certain conditions;

- c) the right to object to the unlawful processing of data, under certain conditions;
- d) the right to have your personal information deleted, under certain conditions;
- e) the right to request that we limit the processing of personal information, under certain conditions, if you believe that we have exceeded the legitimate basis for the processing, that the processing is no longer necessary, or that your personal information is inaccurate;
- f) the right to the portability of the personal data you have provided us in a structured format, commonly used and machine-readable, under certain conditions;
- g) the right to object to decisions taken in an automated manner, the legal or other consequences of which you suffer, under certain conditions; and
- h) the right to lodge a complaint with data protection authorities.

5. How and Why We Use the Information

Purposes of the use of the information

We use information about you under the aforementioned conditions for the purposes listed below:

- to provide our technical support services;
- to develop and improve our services and solutions (for example, by adding new features that can be appreciated by our users or that will help them manage their operations more effectively);
- to monitor and analyze trends, and better understand how users use our products and solutions, which will help us to improve them in turn and make them easier to use;
- to monitor and prevent problems with our solutions and services, ensure their security, detect and prevent illegal activities, and protect Astus' rights and property;
- to inform you, via e-mail for example, of notices of changes to our platforms, new features that may be of interest to you, solicit your opinion or keep you informed of news about Astus and our products; and
- to customize your experience using our solutions and provide content recommendations.

6. Security

No online service is 100% secure, but we make every effort to protect information from unauthorized access, use, alteration or destruction, and take reasonable steps to do so, such as monitoring our services to protect against potential vulnerabilities and attacks.

In the same vein of strengthening the security of our systems, we continue to engage independent firms to perform intrusion tests on our infrastructure and applications.

7. How to Contact Us

If you wish to make a complaint or have any questions about this policy, we invite you to contact our Privacy Officer as follows:

Address: [•]500 – 101 Roland-Therrien, Longueuil, J4H 4B9

Telephone: [•]+1 450 442 7887 ext 250

Email: [•]amouron@astus.com

We will do our best to process your request as soon as possible.