

Pilot Telematics FZ LLC (“Company”, “Garm” or “we,” “our,” or “us”) and its affiliates is a telematics and IoT solutions developer. Company is committed to protecting your privacy. This Privacy Policy tells you what to expect us to do with your personal information when you contact us or use one of our services.

This Privacy Policy applies to websites (<https://pilot-telematics.com> and its subdomains, <https://garm24.com> and its subdomains), e-mails (info@pilot-telematics.com, privacy@pilot-telematics.com, info@garm24.com, privacy@garm24.com), offline and online events, products and services owned or controlled by Company and its affiliates, including but not limited to Garm and the associated apps (“App”) (collectively, our “Services”). By accessing or using our Services, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy.

We take your privacy seriously. All personal data will be collected, stored and used by us in accordance with the [European Union General Data Protection Regulation No. 2016/679 \(“GDPR”\)](#) and/or other applicable statutory regulations.

Personal Data that we collect from you

We collect Personal Data about you in a variety of ways. Sometimes we collect Personal Data automatically when you interact with the Services, and sometimes we collect the Personal Data directly from you.

Personal Data that you provide to us directly:

- First and last name;
- Business/company name;
- Company financial information;
- Payment information;
- Job title;
- ID (for limited purposes);
- Year of birth;
- Gender;
- Email address;
- Phone number;
- Password or passcode;
- Place of residence and associated location information.
- Personal Data that we collect automatically:

Location Information:

- IP address;
- Time zone;

Device Information:

- Device model;
- Unique device identifiers;
- Information about the operating system and its version;
- Mobile operator and network information;
- Device storage information;
- Version of your device system.

Data about your use of the Services includes, among others:

- Frequency of use;
- Areas and features of the Services you access, visit or use;
- Engagement with particular features.

The purposes we process your Personal Data

The Company may use Personal Data for the following purposes:

- To provide and maintain our Services, including monitoring the usage of our Services.
- To manage your account: to manage your registration as a user of the Services. The Personal Data you provide can give you access to different functionalities of the Services that are available to you as a registered user.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the Services.

- To provide you with special offers, news and general information about other goods, services and events we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- To contact you: by email, through telephone calls, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To manage your requests: to attend and manage your requests to us.

For other purposes: we may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, marketing and your experience.

We will process your Personal Data based on one or more of the following legal bases depending on which features of the Services you use:

- Your consent.
For example, on the registration screen when you give us permission to process your Personal Data;
- Legitimate interest.
We may process your Personal Data in relation to our interests in providing the Services to you, our commercial interest;
- Legal obligation.
We may be obligated to process some of your Personal Data to comply with applicable laws and regulations.
- To fulfill our contractual obligations to you in order to provide the Services to you;

How long do we keep your information?

We keep your information only as long as we need it to provide Services to you and fulfill the purposes described in this Privacy Policy. This is also the case for anyone that we share your information with. When we no longer need your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we can't identify you.

Your privacy rights

- The right to access the Personal Data Company holds about you. You have a right to request information about what Personal Data we process about you.
- The right to data portability. You have a right to access all your Personal Data, and receive a copy of it, including in a structured, commonly used and machine-readable format.
- The right to correct any Personal Data we hold about you if it is inaccurate or incomplete. If you believe that your Personal Data is inaccurate, you have a right to contact us and ask us to correct such Personal Data.
- The right to erase your Personal Data. You may ask us to erase your Personal Data if you withdraw your consent to processing when you believe such processing is unlawful. Please be aware that erasing some Personal Data may affect your experience using certain features of the Services that rely on historical data.
- The right to restrict (i.e., prevent) the processing of your Personal Data.
- The right to object to Company using your personal data for particular purposes. In certain circumstances we may not be able to stop using your personal data, if that is the case, we'll let you know why.
- The right to withdraw consent. If we process your data based on your consent, you have the right to withdraw your consent at any time. If you would like to exercise your right to withdraw your consent, please contact us.

In case some questions about your Personal Data protection remain, contact us via email privacy@garm24.com, and we will do our best to solve the problem for you.

Personal information sharing

In addition to the specific situations discussed elsewhere in this policy, we may share personal information in the following situations:

- Affiliates.
We may share information with our corporate affiliates.
- Other disclosures with your consent.
We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy.
- Other disclosures without your consent.
We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights,

to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request.

- Service providers.

We share your information with service providers. Among other things service providers help us to administer our websites, send email communications, conduct surveys, provide technical support, detect fraud, process payments, and assist in the fulfillment of orders. Our service providers will be given access to your personal information as is reasonably necessary to provide the website and related Services. Our service providers are contractually obligated to use your personal information only at our direction and in accordance with our Privacy Policy; to handle your personal information in confidence; and to not disclose your personal information to unauthorized third parties.

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your personal information with third-parties without your consent.

Automated decisions

We neither use automated decision-making nor your Personal Data to automatically assess aspects of your personality (automated profiling).

Complaint

Pursuant to Art.77 GDPR, you have the right to file a complaint with a supervisory authority of the EU Member State where you permanently resign, work or where there was an alleged violation of your information privacy.

Information protection

We implement a variety of technical, organizational and legal security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your Personal Data. For example, our employees have different levels of access to your Personal Data and only those in charge of data management get access to your Personal Data and only for limited purposes required for the operation of the Services. We offer the use of a secure server. Among other practices, your account is protected by a password for your privacy and security. You must prevent unauthorized access to your account and personal information by selecting and protecting your password appropriately and limiting access to your computer or other device and browser by signing off after you finished accessing your account. We cannot, however, ensure or guarantee the absolute security of any information you provide to Company or guarantee that your information on the Services may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, technical, or managerial safeguards.

Contact information

If you have any questions or concerns about your privacy, contact us at:

E-mail: privacy@garm24.com

Address: A4-1220 A4 Building, Al Hamra Industrial Free Zone, RAK, United Arab Emirates

You may also contact your local data protection authority. A list of local data protection authorities is available [here](#).