

# POSITION DATA CORPORATION PRIVACY POLICY

Updated May 1, 2012

Position Data Corporation ("Provider"), ("we," "us," or "our") is committed to respecting the privacy rights of its customers, visitors, and other users of its web sites and Telvistar™ service, (the "Web Sites"). We created this Privacy Policy to give you confidence and describe how we treat personal information as you visit and use the Web Sites. If you are using the Web Sites as or on behalf of any entity, "you" refers to the entity.

## 1. Collection of Personal Information

You need a Provider username and password to access the protected areas of the Web Sites. Provider requires some limited personal information to create a Provider account, which may include your name, your user name, password, email address, billing address and telephone number, and other information. When you use the protected areas of the Web Sites, certain information about your use is automatically recorded and retained, such as account activity (e.g., number of log-ins), data displayed or clicked on (e.g., user interface elements, links), and other log information.

We may collect information from GPS fleet management hardware installed in your vehicles. We may collect contact information and other information about you from our dealers. We also collect information volunteered by visitors to the Web Sites, such as by completing and submitting our online forms or emailing us. When visitors use the Web Sites, our servers automatically collect certain information that the browser sends when visiting web sites in general. This log file information may include the URLs you visited; your IP address; date, time, and time spent on pages visited; and information about your browser and platform.

The Web Sites may use the standard "cookies" feature of major browser applications that allows us to store a small piece of data on your computer about your use of the Web Sites. You can choose whether to accept cookies by changing the settings on your browser. However, if you choose to disable this function, your experience with the Web Sites may be significantly diminished and many features may not operate.

## 2. Information Uses

We use the personally identifiable information and aggregate information we collect to maintain your Provider account and market and provide the Web Sites to you and others, to improve our offerings and to create new offerings. We may send you certain service and administrative notices.

We use cookies and log file information to remember your information so that you do not need to re-enter it when using the Web Sites, and to administer and monitor usage of the Web Sites.

## 3. Information Sharing

We do not sell, rent or otherwise share your personal information with any third parties except in the following limited circumstances. We share your information with our dealers. We may share such information if we in good

faith believe that such action is necessary to: (a) comply with any law, regulation or order, such as subpoena, court order or search warrant; (b) provide the Web Sites using subcontractors under confidentiality agreement; (c) protect and defend the rights or property of Provider, including investigations and defense of third-party claims; (d) otherwise ensure compliance with Provider customer agreements and policies; and/or (e) protect the rights, property and personal safety of Provider users, staff or the public. Provider reserves the right, in the event all or any relevant portion of the stock, business or assets of Provider is transferred to, acquired by or merged with any third party, to transfer or assign as part of such transaction any or all of the information we have collected.

## 4. Account Cancellation

We may retain any information to the extent required by law or otherwise in connection with the permitted information sharing described above.

## 5. Links

The Web Sites and content on it (either from us, and/or third parties) may contain links to other sites and resources controlled by third parties. Provider is not responsible for privacy practices or content of these other sites or resources, and you should consult the privacy statements of such other sites and resources.

## 6. Changes

We may amend this Privacy Policy at any time by posting a revised version on the Web Sites and/or sending information regarding the amendment to your email address of record with Provider. You shall be deemed to have accepted such amendments by continuing to use the Web Sites after such amendments have been posted or information regarding such amendments has been sent to you. If you do not agree to any of such changes, you may immediately cease all access and use of the Web Sites.

## 7. International Users

The Web Sites is hosted and provided in the United States of America. If you are accessing the Web Sites from the European Union, Asia, or any other jurisdiction with laws or regulations governing personal data collection, use, and disclosure, which differ from United States laws, please be advised that through your use of the Web Sites, you are transferring your personal information to the United States of America and you consent to that transfer.