

## Privacy Policy

Last Updated: March 2022

This privacy policy describes how ALDS, Inc. and its affiliates (collectively (“Stargard,” “we”, “us” and/or “our”), collects, uses and discloses personal information that we collect when you use our websites – [www.stargardgps.com](http://www.stargardgps.com) and [www.svrtracking.com](http://www.svrtracking.com) (our “Sites”) – and/or use our advanced vehicle protection, stolen vehicle recovery, and/or vehicle location services (collectively, our “Services”). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Click [here](#) to download a copy of this Privacy Policy.

### Updates to this Privacy Policy

We may revise or update this Privacy Policy from time to time. The last updated date at the top of the Privacy Policy indicates the most recent date of revision. The updated Privacy Policy will be posted on our Sites. Your continued use of the Services or Sites after we post a revised Privacy Policy signifies your acceptance of the revised Privacy Policy.

### Contact Us

If you have questions or concerns regarding our privacy practices or this Privacy Policy, you may contact us:

- By visiting this page on our website: <https://stargardgps.com/#contact>
- By sending us an email: [support@stargardgps.com](mailto:support@stargardgps.com)
- By calling this toll-free number: 1-800-443-5535

### Categories and Types of Personal Information We Collect

The types of personal information relating to you that we may "process" (such as collect, use and store) depends on your interaction with us. The key categories and types of personal information that we may collect and process are set out below.

- **Contact Information:** name, email address, mailing address, and telephone number.
- **Financial Information:** financial or bank account information, payment card number, payment card expiration date and CVV code, card or account security details, and billing address.
- **Identifiers:** IP address, username, account number, password and other security information for authentication and access.
- **Geolocation Data:** the general region or area from which you access our site.
- **Usage Data:** data concerning your Internet or other electronic activity including browsing and click history, device types, operating system, browser settings, IP address, language settings, and Site use data including information about how you navigate the Site, other websites, and the Internet.
- **Commercial Information:** records of products or services purchased, obtained or considered, or other purchasing or consuming histories.
- **Inferences:** we may use information from the categories described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude

### Use of Your Personal Data

We use your personal information for the following purposes:

- **Transactional Purposes:** We use your contact information, financial information, identifiers, commercial information, and inferences to:

- Provide a quote for our Services;
- Process and fulfill your order;
- Process payments;
- Send confirmations;
- Communicate with you;
- Respond to customer service requests and inquiries; and
- Administer an online account.
- **Providing the Services:** We use your contact information, identifiers, commercial information, geolocation data and inferences to:
  - Tracking of vehicles to aid in the recovery if a vehicle is stolen, abandoned or for general recovery purposes;
  - Tracking of vehicles or assets for security, fleet optimization and automotive dealer lot management;
  - Tracking of mileage for vehicle routine maintenance;
  - Tracking of vehicles to improve driver safety (i.e., speed alerts and late driving); and
  - Management reporting for business optimization.
- **Analytics:** We use your identifiers, usage data, geolocation data, commercial information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotion:** We use your contact information, identifiers, commercial information, usage data, geolocation data, and inferences to send you newsletters, improve our marketing efforts, create social media posts or advertisements, and provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of the Sites and Services:** We use your contact information, commercial information, identifiers, geolocation data, and usage data to answer your questions and respond to your requests, improve our Services and Sites, provide and maintain functionality on our Sites, and help us diagnose technical and service problems and administer our Sites.
- **Security and Fraud Prevention:** We use your contact information, identifiers, commercial information, financial information, geolocation data, usage data and inferences to protect our Sites and Services; protect us, our affiliated companies, our employees and agents, our carriers and others; and to prevent fraud, theft and misconduct.
- **Legal:** We use your contact information, identifiers, financial information, employment information, geolocation data, usage data and inferences to comply with our legal obligations, including reporting requirements, and defend us in legal proceedings, and protect us and our property, employees, and others through legal proceedings.

### **Sources of Personal Information**

We collect information from the following sources:

- **Directly from you:** We collect contact information, financial information, identifiers, and commercial information that you provide directly to us.
- **Automatically:** When you access our Sites, we collect identifiers, geolocation data, and usage data using tools like browser cookies.
- **Dealerships:** We may collect contact information, identifiers, commercial information, and inferences from the dealership that you purchase your car from.

- **From social media platforms and networks:** We may collect contact information, identifiers, geolocation data, usage data, and commercial information from social media platforms and networks that you use in connection with our websites or mobile applications, or that share or allow you to share information with us, such as Facebook, Twitter, Pinterest, and Instagram.
- **Combined Information:** We combine information we obtain from different sources with publicly available information, to create inferences about you.

### **How We Share Personal Information**

We will share personal information in the following circumstances or as otherwise described in this Privacy Policy:

- **Service Providers:** We may share personal information with vendors and service providers who support the operation of the Services, the Sites, and our business and who need access to such information to carry out their work for us (including, for example, web hosting, analytics, payment processing, order fulfillment, email delivery, marketing, insurance, transportation, storage services, shipping, and customer support services). In some cases, the vendor or service provider may directly collect the information from you on our behalf.
- **Affiliates:** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.
- **Marketing/Analytics/Advertising Partners:** We may share personal information with third party marketing, analytics or advertising partners, including social media platforms and networks, for commercial purposes such as sending you marketing emails and advertisements.
- **Professional Advisors:** We may share information with professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Government Entities:** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; corporate registries; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations.
- **With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.

### **How Long We Keep Personal Information**

We will retain and use your information for as long as your account is active, as long as we need it to provide you Services, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you wish to cancel your account or request that we no longer use your information to provide you Services contact us at [support@stargardgps.com](mailto:support@stargardgps.com).

### **Cookies**

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our Sites. We receive and store certain types of information when you visit our Sites. When you access the Sites, we (including companies we work with) may place small data files on your computer or other device. These data files may be web

beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, allow us to understand how users navigate to and around our Sites, view different pages, access content and request Services. We may use them, for example, to keep track of your preferences and profile information and collect general usage and volume statistical information. Most web-browsers offer the option to refuse any cookie, but they also usually accept cookies by default. You can change this default in most browsers and cause the browser to stop accepting cookies or to prompt you before accepting a cookie from a website. If you choose to decline cookies, you may not be able to fully experience the functionality for our website or services. You can also find instructions on how to manage cookies on different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Do Not Track Signals**

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

### **Third-party Analytics and Advertising**

We allow others to provide analytics services and serve advertisements on our behalf across the Internet and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity.

### **Google Analytics**

We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt-out, Google provides a an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

### **Security**

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

### **Personal Information of Children**

Stargard’s service is a general audience service, and does not direct any of its content, products, or services toward children less than 13 years of age. We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [support@stargardgps.com](mailto:support@stargardgps.com).

### **Third-Party Links**

Stargard may insert links to third-party websites whose privacy practices may differ from those of Stargard. This privacy policy does not apply to such third-party websites. These links take you outside our service and are beyond our control.

This includes links from customers or partners that may use Stargard’s logo as part of a co-branding agreement. While we seek to protect the integrity of our service, Stargard is not liable for the content and activities of those sites. Your access to such websites is at your own risk. Please note that those other sites may send their own cookies to users, collect data, or solicit Personal Information.

**Marketing Communications**

You can opt out of marketing or advertising emails and newsletters by using the "unsubscribe" link noted in communications you receive from us. You may also request to opt-out by contacting us at [support@stargardgps.com](mailto:support@stargardgps.com). Once we process your request, we will cease using the information for marketing purposes at no charge to you but may still contact you for non-marketing and administrative reasons, such as administering your account with us.

**Processing in the United States**

We are based in the United States. If you are using the Sites or Services from outside the United States, please be aware that information we obtain about you will be processed in the United States or in other jurisdictions. By using the Sites or Services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other countries may be different from the laws in your country of residence.

**California Specific Provisions**

If you are a California resident, this section of the Privacy Policy applies to you.

**Shine The Light:** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties’ direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [admin@stargardgps.com](mailto:admin@stargardgps.com) and include “CA Shine the Light” in the subject line of your email.

**California Consumer Privacy Act (CCPA) Disclosures and Rights**

Collection, Use and Disclosure of Personal Information. In the preceding 12 months, we have collected the following categories of personal information: contact information, identifiers, financial information, commercial information, geolocation data, usage data and inferences. The Chart below details the categories of personal information we have collected, the sources of that information, the business and commercial reasons we have collected and used that information, and the categories of third-parties to which we have disclosed that information. The time period of this chart is the twelve month period preceding the last-updated date on the top of this Privacy Policy.

<i>Category of Personal Information</i>	<i>Categories of Sources</i>	<i>Business and Commercial Uses</i>	<i>Categories of Recipients</i>
Contact Information	You, dealerships, social media platforms and networks	transactional purposes, providing the Services, marketing and promotion, maintenance and improvement of the Sites and Services, security and fraud prevention, legal	service providers, affiliates, professional advisors, government entities, corporate transaction recipients
Unique Identifiers	You, automatically from cookies, dealerships, social media platforms and networks	transactional purposes, providing the Services, analytics, marketing and promotion,	service providers, affiliates, professional advisors, government entities,

		maintenance and improvement of the Sites and Services, security and fraud prevention, legal	marketing/analytics/advertising partners
Financial Information	You	transactional purposes, security and fraud prevention, legal	service providers, affiliates, professional advisors, government entities, corporate transaction recipients,
Commercial Information	You, automatically from cookies, dealerships, social media platforms and networks	transactional purposes, providing the Services, analytics, marketing and promotion, maintenance and improvement of the Sites and Services, security and fraud prevention, legal	service providers, affiliates, professional advisors, government entities, corporate transaction recipients, marketing/analytics/advertising partners
Usage Data	automatically from cookies	analytics, marketing and promotion, maintenance and improvement of the Sites and Services, security and fraud prevention, legal	service providers, affiliates, marketing/analytics/advertising partners
Geolocation data	automatically from cookies, through the use of the Services	providing the Services, analytics, marketing and promotion, maintenance and improvement of the Sites and Services, security and fraud prevention, legal	service providers, affiliates, marketing/analytics/advertising partners
Inferences	You, automatically from cookies, publicly-available information, dealerships, social media platforms and networks	transactional purposes, providing the Services, analytics, marketing and promotion, maintenance and improvement of the Sites and Services, security and fraud prevention, legal	service providers, affiliates marketing/analytics/advertising partners

For a more expansive description of the categories in this chart, please see the sections above titled Categories and Types of Personal Information We Collect, Use of Your Personal Data, Sources of Personal Information, and How We share personal information.

#### Sale of Personal Information

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. We have not sold, and do not sell, personal information.

#### Personal Information of Consumers Under 16 Years of Age

We do not knowingly collect Personal Information from anyone under the age of 16. We have not sold, and do not sell, personal information of anyone under the age of 1.

#### Your Rights Under the CCPA

Subject to certain exceptions, the CCPA affords California consumers the following rights:

1. The Right to Know About Personal Information Collected, Disclosed, or Sold

You have a right to know what personal information we have collected, used, disclosed and sold about you in the preceding 12 months. You can also request copies of the specific pieces of personal information we have collected about you. You can also request the following categories of information from us:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information was collected.
- The business or commercial purpose for collecting or selling the personal information.
- The categories of third parties with whom we shared personal information.

2. Right to Request Deletion of Personal Information

You can also request that we delete your personal information. We may not delete all of your personal information if one of the exceptions to the CCPA applies. Please note that if we delete your personal information, the Services provided may not maintain the same functionality. For example, your previous opt out requests will not be saved and saved preferences and information will no longer be available.

3. Right to Opt-Out of Sale of Information

You have a right to opt-out of the sale of your personal information. The CCPA defines a "sale" as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration. While we do not sell personal information for monetary value, we may disclose personal information to third parties, such as marketing/analytics/advertising partners, in such a way that may be considered a "sale" of personal information under the CCPA. We do not sell personal information of minors who we know are under 16 years of age.

4. Right to Not Be Discriminated Against

You have a right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights Under the CCPA

To exercise any of your CCPA rights, please email us at [support@stargardgps.com](mailto:support@stargardgps.com) or call us at 1-800-443-5535. You must use "CCPA Request" in the subject line of your email. For all requests, you must provide us with your name, email address, phone number, and mailing address. Failure to provide all of the foregoing information will prevent us from processing your request.

Further, in order to verify your identity, we will provide a verification form to you at your email address. Please be aware that you must complete the verification form and submit it to us in order for us to match that information to the information we have in our systems and process your request. Additionally, some requests may be subject to additional identity verification procedure. In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [support@stargardgps.com](mailto:support@stargardgps.com)

**Other Consumer Rights Information:** Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- The Site is owned and operated by ALDS, Inc.
- Unless otherwise expressly stated, this Site is provided without charge.

- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [support@stargardgps.com](mailto:support@stargardgps.com) or by telephone by calling 1-800-443-5535. You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210