

TRAK-IOT.online APP

Privacy Policy

Last updated: May 16, 2023

Version effective date: May 16, 2023

Welcome to TRAK-IOT.online APP! We take the protection of your privacy and personal information very seriously. This Privacy Policy applies to your access to and use of TRAK-IOT.online services by any means.

You can use TRAK-IOT.online to inquire about the basic information and location of the unit, get your current location, and search for the operation unit in the vicinity of supervision, etc. The specific services you receive from TRAK-IOT.online may vary depending on the version and device you are using. If some versions or devices do not cover certain services or do not provide certain functions (e.g. some versions do not support login, we may not be able to provide you with third-party services and other functions that can only be used after login). You can use our products and services in many different ways, including TRAK-IOT.online PC terminal.

This privacy policy is designed to help you understand what data we collect, why we collect it, what we do with it, and how we protect it. Please make sure you read this privacy policy carefully and use TRAK-IOT.online services after confirming that you fully understand and agree to it. If you do not agree to any of the contents of this privacy policy, please stop using it immediately.

Please note that the third parties who provide products and services to you through TRAK-IOT.online, the website operators you visit through TRAK-IOT.online, and the third parties who receive your information and provide services to you through TRAK-IOT.online's PC terminal will store, use, process and protect your personal information according to the standards described in their own privacy policies. This Privacy Policy is not a substitute for the privacy policies of such third parties. We will make every effort to require third party service providers to provide adequate levels of security for your personal information and will clearly inform you on specific product pages that the service is provided by a specific third party.

We understand how important your personal information is to you, and that effective protection of your information is the cornerstone of our healthy and sustainable business. Thank you for your use of and trust in TRAK-IOT.online! We are committed

to maintaining your trust in us and protecting your personal information by adhering to the following principles: the principle of consistency of rights and responsibilities, the principle of clarity of purpose, the principle of choice of consent, the principle of minimum sufficient use, the principle of ensuring security, the principle of subject participation, and the principle of openness and transparency.

We solemnly promise that we will take appropriate safety protection measures to protect your personal information in accordance with the mature safety standards in the industry.

I. How we collect and use your personal information

Personal information refers to all kinds of information recorded electronically or otherwise that can identify a specific natural person or reflect the activities of a specific natural person, either alone or in combination with other information. Information that is not related to you personally, such as map data, is not your personal information.

In order to provide you with better and more customizable products and services, we may collect and use your personal information in the following ways when you use the following services, features or settings:

1. you directly provide and we automatically collect personal information core business functions such as location-based services, third-party services including map services provided by third parties, etc.

2. In the process of your use of the service we obtain permission to:

(1). User permissions

a) file storage privileges

b) Location permission

(2).sdk permissions

a) Google Maps positioning

b) Aurora message push

You know and agree that if you refuse us to obtain the corresponding permission, you will not be able to use the corresponding function.

3. Registration information.

You can use the TRAK-IOT.online service by logging into the TRAK-IOT.online general account registered through the administration backend. We will collect the information in your registered account, including the user's name, account number, telephone number, and other information. If you do not provide the above information or the information provided is wrong, you may not be able to obtain the relevant services or functions, or you may not be able to achieve the intended effect of the relevant services. If you have any questions about our collection and use of sensitive personal information, you may contact the staff member providing the service directly or contact us through the contact information provided in this Privacy Agreement.

4. Location information.

When you enable your device's location and use our location-based services, we collect location information so that you do not need to manually enter your own geographic coordinates to access the services. We use a variety of technologies for location, including IP addresses, GPS, and other sensors that can provide relevant information (e.g., we may provide the TRAK-IOT.online with information about nearby devices, WLAN access points, and base stations). You can stop our collection of your geolocation information by turning off the location feature through system authorization, but then you may not be able to use the relevant service or feature or achieve the intended results of the relevant service.

5. Exceptions to Prior Authorized Consent

(1) Please note that prior authorized consent is not required for the collection and use of personal information in the following cases:

- a) Directly related to national security or national defense security;
- b) directly related to public safety, public health, and significant public interest;
- c) directly related to crime investigation, prosecution, trial and execution of judgments, etc;
- d) for the purpose of safeguarding your or other individuals' life, property and other significant legitimate rights and interests but where it is difficult to obtain your consent
- e) The personal information collected is disclosed by you to the public on your own;
- f) Where personal information is collected from information that is lawfully and publicly disclosed, such as lawful news reports, government information disclosure and other channels;
- g) necessary to provide products or services to you at your request
- h) necessary for maintaining the safe and stable operation of the products or services provided, such as the discovery and disposal of product or service failures
- i) Other circumstances as provided by laws and regulations.

6. Information you share with others on your own initiative. TRAK-IOT.online cannot grow without the joint efforts of users from all parties, etc. We appreciate your contributions to TRAK-IOT.online in terms of data updates and product suggestion feedback. You can use the TRAK-IOT.online service email support@trak-iot.com for feedback suggestions to help more users enjoy better product services.

7. Exceptions to Prior Authorized Consent for Sharing, Transferring, and Publicly Disclosing Personal Information

Prior authorized consent of the subject of personal information is not required for sharing, transferring, or publicly disclosing personal information in the following cases:

- (1) Directly related to national security and national defense security
- (2) directly related to public safety, public health, and significant public interest
- (3) directly related to crime investigation, prosecution, trial and execution of judgments, etc;
- (4) For the purpose of safeguarding the life, property and other significant legitimate

rights and interests of the subject of personal information or other individuals but it is difficult to obtain their consent; personal information disclosed to the public by the subject of personal information itself; personal information collected from legitimate public disclosures, such as legitimate news reports, government information disclosure and other channels.

(5) Other circumstances as stipulated by laws and regulations.

II. How we keep and protect your personal information

1.Retention period. In order to enable you to use TRAK-IOT.online's diverse products and services and effectively deal with disputes that may arise, in addition to meeting the mandatory requirements for data retention under the Network Security Law of the People's Republic of China, we will keep your personal information for the duration of your use of TRAK-IOT.online and until the expiration of the statute of limitations for related actions. After the above period, we will delete or anonymize your information (i.e. we will process your personal information so that your identity cannot be identified by any third party).

2.Storage area. Your personal information is stored in the People's Republic of China, and we will separately obtain your authorized consent if we need to transfer it across the border.

3.You authorize us to use your personal information during your use of TRAK-IOT.online products and services, and if you deregister your account, we will stop using and delete your personal information.

4.When we want to use the information for other purposes not stated in this privacy policy, we will ask for your consent in advance. We will ask for your consent when we use information collected for a specific purpose for other purposes.

5. Security measures.

(1) We attach great importance to information security. We have established a dedicated team responsible for the development and application of various security technologies and procedures, etc. We will conduct security background checks on the person in charge of security management and personnel in key security positions, and we have established a comprehensive information security management system and internal security incident handling mechanism, etc. We will take appropriate security measures and technical means in line with industry standards to store and protect your personal information to prevent loss, unauthorized access, public disclosure, use, destruction, loss or leakage of your information. We will take all reasonably practicable steps to protect your personal information. We will use encryption technology to ensure the confidentiality of data; we will use trusted protection mechanisms to prevent malicious attacks on data.

(2) We will train and evaluate our employees on data security awareness

development and security capabilities to strengthen their understanding of the importance of protecting personal information. We will authenticate and control the identity of employees who handle personal information, and sign confidentiality agreements with employees and partners who have access to your personal information to clarify job responsibilities and codes of conduct and ensure that only authorized personnel have access to personal information. If there is any violation of the confidentiality agreement, the cooperation relationship with our company will be immediately terminated and relevant legal responsibilities will be pursued, and confidentiality requirements are also put forward for personnel who have access to personal information when they leave the job.

(3) We remind you that the Internet is not an absolutely safe environment, when you interact with your geographic location or track information through the third-party applications embedded in TRAK-IOT.online, we are not sure whether the third-party software is fully encrypted for the transmission of information, so be careful to ensure the safety of your personal information.

(4) We also ask you to understand that in the Internet industry, due to the limitations and rapid development of technology and the possible existence of various malicious attacks, it is not always possible to guarantee 100% security of information, even if we do our best to strengthen security measures. Please understand that the systems and communication networks you use to use our products and/or services may have security issues at other points outside of our control.

According to our security management system, the leakage, destruction or loss of personal information is classified as the most serious security incident, and once it occurs, the highest level of the company's emergency plan will be activated, and the security department, government relations department, legal department and other departments will form a joint emergency response team to deal with it.

6. Notification of security events

(1) We will develop emergency plans for network security events and promptly dispose of system vulnerabilities, computer viruses, network attacks, network intrusions and other security risks. In the event of an event that jeopardizes network security, we will immediately start the emergency plan, take appropriate remedial measures, and report to the relevant authorities in accordance with the regulations.

(2) Personal information leakage, destruction or loss is a company-level mega-security event, and we will be responsible for organizing regular security plan drills for members of the working group to prevent such security events. In case of unfortunate occurrence, we will activate the emergency plan according to the highest priority and form an emergency response team to trace the cause and reduce the loss in the shortest possible time.

(3) After the unfortunate occurrence of a personal information security incident, we will, in accordance with the requirements of laws and regulations, promptly inform you of the basic situation and possible impact of the security incident, the handling measures we have taken or will take, suggestions for risks you can prevent and reduce on your own, remedial measures for you, etc. We will promptly inform you of the incident by

in-site notification, SMS notification, phone call, email and other contact information you have reserved, and we will take reasonable and effective ways to inform you when it is difficult to inform you one by one, such as publishing announcements on our official website, WeChat public number and other public channels. At the same time, we will also take the initiative to report the disposal of personal information security incidents in accordance with the requirements of the regulatory authorities.

III. Your rights

In accordance with the relevant Chinese laws, regulations and standards, as well as the common practices of other countries and regions, we protect your rights to exercise the following rights to your personal information:

1. Access rights.

In principle, you can access your personal information and account information in the following ways: you can contact the administrator to log in and access or edit your personal information in your account, change your password, add security information, make account associations, etc.

2. Right of correction.

When you find errors in the personal information we process about you, you have the right to correct or update the incorrect or incomplete information after verifying your identity and if the correction does not affect the objectivity and accuracy of the information, you can contact the administrator to correct your identity information, or submit your correction request to us through feedback and error reporting.

3. Right to delete.

You may request us to delete your personal information in the following cases:

- (1) If we terminate the product operation and services of TRAK-IOT.online;
- (2) We will delete your personal information or do anonymization if you have cancelled your account;
- (3) If it involves trade secrets:

If we collect, use, share or transfer your personal information with others in violation of laws and regulations or in agreement with you, you have the right to request us and the third party to delete it.

If we publicly disclose your personal information in violation of laws and regulations or our agreement with you, you have the right to request that we immediately stop the public disclosure and issue a notice requesting the relevant recipient to delete the corresponding information.

If we decide to respond to your request for deletion, we will also simultaneously notify the entities from which we obtained your personal information and request their prompt deletion, unless otherwise required by law or regulation, or unless such entities have your independent authorization.

When you delete information from our service, we may not immediately delete the corresponding information from our backup system, but will delete it when the backup is updated.

4. Right of revocation.

Each business function requires some basic personal information in order to be completed. You may give or withdraw your authorized consent at any time for the collection and use of additional personal information collected. When you withdraw your consent or authorization, we will not be able to continue to provide you with the services to which you have withdrawn your consent or authorization, and will no longer process your corresponding personal information. However, your decision to withdraw your consent or authorization will not affect the processing of personal information that was previously carried out based on your consent or authorization.

5. Be informed of the right to discontinue the operation of products and services in advance.

If TRAK-IOT.online products and services are forced to cease operation due to special reasons, we will notify you 15 days in advance on the main page of the product or service or intranet or send you an email or other appropriate means to reach you, and will stop collecting your personal information and will delete or anonymize the personal information held in accordance with legal regulations. We will also delete or anonymize your personal information held by us in accordance with the law. For security purposes, you may be required to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request. We will respond within thirty days. In principle, we do not charge a fee for your reasonable requests, but we will charge a cost fee for multiple repetitive requests that exceed reasonable limits, as appropriate. We may deny requests that are unwarrantedly repetitive, require excessive technical means (for example, requiring the development of new systems or fundamental changes to current practices), pose a risk to the legal rights of others, or are highly impractical.

6. In the following cases, we will not be able to respond to your requests for correction, deletion or cancellation of information in accordance with the requirements of laws and regulations:

- (1) directly related to national security and national defense security
- (2) Directly related to public safety, public health, and significant public interests;
- (3) directly related to crime investigation, prosecution, trial and execution of judgments, etc;
- (4) Where we have sufficient evidence of subjective malice or abuse of rights (such as where your request would jeopardize public safety and the legitimate rights and interests of others, or where your request is beyond the scope of what can be covered by ordinary technical means and commercial costs)
- (5) Responding to the request of the subject of personal information will lead to serious damage to the legitimate rights and interests of you or other individuals or organizations;
- (6) Where commercial secrets are involved.

IV. Revisions to the Privacy Policy

Our privacy policy is subject to change.

We will not reduce your rights under this Privacy Policy without your express consent. We will post any changes to this Privacy Policy on this page.

If the changes reduce your rights or increase your obligations ("Material Changes"), we will notify you on the main exposure page of the product or service or in a letter or email to you or other appropriate means of reaching you. We will allow a reasonable period of time for you to consider whether to accept the change before it becomes effective. If you continue to use TRAK-IOT.online services after the new version of the Privacy Policy and Terms of Service has taken effect, it means that you have fully read and are willing to be bound by the updated Privacy Policy and Terms of Service, and you may stop using TRAK-IOT.online products and services if you do not agree with such changes.

The changes to this policy include, but are not limited to:

1. Significant changes in our service model. Such as the purpose of processing personal information, the type of personal information processed, the way personal information is used, etc;
2. Significant changes in our ownership structure, organizational structure, etc. such as change of ownership caused by business restructuring, bankruptcy and merger, etc;
3. changes in the main recipients of personal information sharing, transfer or public disclosure;
4. significant changes in your rights to participate in the processing of personal information and the manner in which they are exercised;
5. When there is a change in the department responsible for handling personal information security, our contact information and complaint channels;
6. When the personal information security impact assessment report indicates that there is a high risk.

We will also keep an older version of this policy on file for your review.

V. Contact us

The "TRAKIOT.online" APP is provided to you by Qingdao lunz Software Technology Co.

If you have any questions, comments or suggestions about this privacy agreement, or inquiries, complaints and feedback about the protection of your personal information, please contact us through our customer service hotline 4000114828. Generally, we will respond within ten days.

Thank you again for your trust and use of TRAK-IOT.online!