



Guidepoint Systems Universal Privacy Notice


Last updated on: November 27, 2024

Privacy Summary
OUR CONTACT INFORMATION
<div style="text-align: center;"> GPSi, LLC Address: 25231 Dequindre Road Madison Heights, MI 48071 USA Phone number: U.S.: +1 877 477 3463 (primary) Regional phone numbers: Austria: +43 800 018 240 Switzerland: +41 800 561140 France: +33 756 758 951 Germany: +49 30 800982760 Italy: +39 02 0070 1153 Italy: +39 800 769 407 Mexico: +52 1 442 628 7281 Poland: +48 61 100 27 09 Sweden: +46 724 002 332 Email address: dataprivacy@guidepointsystems.com Contact details of our Data Protection Officer: Guidepoint Systems Europe Sp. z o. o. Data Protection Officer Email: rob@guidepointsystems.com</div>

Phone: 8172983149,
Address: 25231 Dequindre Rd
 Madison Heights, MI 48071
 United States

GENERAL INFORMATION

	Do we collect Personal Data?	YES. Some categories include contact information, payment data and application data. Click here to know which categories of Personal Data we collect and how we obtain them.
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	Do we sell Personal Data?	NO
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TRACKING





Do we use cookies or similar tracking technologies on our website?	YES
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Do we use cookies or similar tracking technologies in our app?	YES
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Do we track your activities in other websites?	NO
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

PRIVACY RIGHTS

	Can you request to receive a copy of the Personal Data we have collected about you?	YES Click here to learn how.
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	Can you withdraw your consent to our processing of your Personal Data?	YES Click here to learn how.
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	Can you request to have your Personal Data deleted?	YES Click here to learn how.
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	Do we discriminate against you for exercising your privacy rights?	NO Click here to learn more about your right not to be discriminated against.
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	Do we offer you financial incentives for your Personal Data?	NO
SECURITY		
	Do we protect your Personal Data?	YES Click here to learn more about how we protect your Personal Data.

Introduction

GPSi, LLC and all affiliates listed below under “**Entities Covered by This Privacy Notice**” (collectively “**Guidepoint Systems**”, “**we**”, “**us**”, “**our**”) take the protection of personal data (“**Personal Data**”) very seriously. Please read this privacy notice (the “**Notice**”) to learn, what Personal Data of yours we collect, what we are doing with your Personal Data, how we protect it, and what privacy rights you may have under applicable data protection and privacy laws, such as the European Union General Data Protection Regulation (“**GDPR**”) and the California Consumer Privacy Act of 2018 (“**CCPA**”).

What Is Covered by this Privacy Notice?

This Notice addresses data subjects (which includes both individuals and households) whose Personal Data we:

- receive from our customers and business partners (“**Business Partners**”) either from devices in vehicles or from any of our web-based software applications such as [My Guidepoint](#), our mobile application (I-DUV), our Facebook application (I-DUV), or any other application of ours that links to or references this Notice, (collectively, the “**Services**”) as well as in the course of providing consulting services and Business Partner support services;
- receive directly through any of our websites (such as when you visit our website <https://www.i-duv.com>);
- receive from our business partners; or
- process to promote our products and services.

What Is Not Covered by this Privacy Notice?

Human Resources Personal Data



This Notice does not apply to the Personal Data of employees, job applicants, contractors, business owners, directors, officers, and medical staff of Guidepoint Systems.

Information Which Does Not Constitute Personal Data



If we do not maintain information in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household, such information is not considered Personal Data and this Notice will not apply to our processing of that information.

What Can You Find in this Notice?

This Notice tells you, among other things:

- [What Personal Data we collect about you and how we obtain it;](#)
- [The legal bases for processing your Personal Data;](#)
- [For what purposes we use that Personal Data;](#)
- [How long we keep your Personal Data;](#)
- [With whom we share your Personal Data;](#)
- [Your rights about the Personal Data we collect about you and how you can exercise those rights;](#)
- [How we protect your Personal Data;](#) and
- [How to contact us.](#)

Our Role With Respect to Your Personal Data

There is Personal Data that we process for our own purposes and Personal Data that we process on behalf of our Business Partners. This means that we do not always have the same degree of decision-making with respect to why and how each piece of Personal Data will be processed.

- Regarding the Personal Data of direct users of our websites, apps, or the Services, or business contacts and prospects of Guidepoint Systems, we decide the purposes and means of processing, and consequently act as a data controller or “business”.
- Regarding the Personal Data of the data subjects or customers of our Business Partners who are users of our app and Services, we process Personal Data as “service providers” or data processors on behalf of our Business Partners, who use our Services. Where you give your data to one of our Business Partners or where we collect your Personal Data on their behalf, our Business Partner’s privacy notice, rather than this Notice, will apply to our processing of your

Personal Data. If you have a direct relationship with one of our Business Partners, please contact them to exercise your privacy rights.

Entities Covered by this Privacy Notice

This Notice covers GPSi, LLC and the following affiliate entities (the “**Affiliates**”):

- GUIDEPOINT SYSTEMS BRAZIL LTDA;
- GUIDEPOINT SYSTEMS EUROPE SP. Z O.O.;
- Guidepoint Systems Mexico, S. de R. L. de C.V.

Lawful Bases for Processing



To use your Personal Data, we must have a valid reason, which under some laws is called the “lawful basis for processing” or “legal grounds for processing.” When we act as a data controller, we may process your Personal Data based on these reasons:

- **Your Consent:** Sometimes, we will use your Personal Data because you actively indicated it is okay that we do so. This includes, for example, when you grant us consent by downloading our app on your mobile phone.
- **Keeping Our Agreement Obligations:** This includes using your Personal Data to fulfill our agreement with you by, for example, We may process your Personal Data we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests:** We sometimes use your Personal Data because we believe it is in our best interest or the interest of someone else. Legitimate interests work when we use your Personal Data in ways that make sense and do not intrude on your privacy much. Or when we have a very good reason for it. Here is what it normally means for us:
 - **Product Improvement:** We may use data to enhance the Services features and functionality, making them more useful and user-friendly.
 - **Customer Engagement:** Keeping users, subscribers and others informed about updates, new features, and content that may interest them.
 - **Research and Development:** Using aggregated and anonymized data to conduct research on trends and user behavior to improve the Services.
 - **Marketing and Promotion:** Promoting the Services to a wider audience and providing tailored recommendations based on user data.
 - **Security and Fraud Prevention:** Protecting the Services and its users from security threats, fraud, and abuse.

- **Legal Compliance:** Ensuring compliance with relevant laws and regulations, including the rules from other countries besides yours.
- **Business Operations:** Managing day-to-day operations and ensuring the app's sustainability and growth.
- **Following the Law:** This includes processing your Personal Data to follow all applicable laws, such as keeping records of your cookie choices to comply with EU law, such as the e-Privacy Directive and the GDPR and complying with industry specific regulations and guidance, as well as where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Other Reasons:** This includes using your data for any other reason that any applicable laws allow.

If we use legitimate interests as the reason for using your Personal Data, you can ask us for more details about why we think it is a good idea. Just get in touch using the contact details [here](#).

When we use your Personal Data because you gave us permission (consent), you can change your mind at any time. However, this **will not** undo the things we did with your data before you changed your mind. It also **will not** change the things we are allowed to do with your data **based on other lawful bases for processing which are still applicable**.

Where we receive your Personal Data as part of providing our Services to you to fulfill a contract, we require such Personal Data to be able to carry out the contract. Without that necessary Personal Data, we will not be able to provide the Services to you.

Within the scope of this Notice, we also process Personal Data based on the instructions of our Business Partners. To learn about their lawful bases for processing your Personal Data, please read the privacy notice(s) of our Business Partners.

What Personal Data We Process and How We Obtain It



The table below describes the categories of Personal Data we have collected about you in the last twelve months.

Personal Data We Collect, Process, or Store	How We Obtain It
<p><i>Identifiers</i></p> <p>A real name, alias, postal address, unique personal identifier, online identifier, Internet</p>	<ul style="list-style-type: none"> • You engage one of our Services.

<p>Protocol address, email address, account name, tax ID number, , or other similar identifiers.</p>	<ul style="list-style-type: none"> • If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services. • Our Business Partners (including their employees, contractors, and other representatives of their companies) provide it to us. • You visit our websites and social media sites or use our app. • You sign up for one of our events. • We receive it from other companies within our corporate group.
<p><i>Contact Information</i></p> <p>Phone numbers, email addresses, mailing addresses, authentication data, contact preferences, billing addresses.</p>	<ul style="list-style-type: none"> • You engage one of our Services. • If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services. • Our Business Partners (including their employees, contractors, and other representatives of their companies) provide it to us. • You visit our websites and social media sites or use our app. • You sign up for one of our events. • We receive it from other companies within our corporate group.
<p><i>Sensitive Personal Data (as per U.S. state or federal law)</i></p> <p>A name, signature, address, telephone number, passport number, state identification card number, insurance policy number, or medical information. Some Personal Data included in</p>	<ul style="list-style-type: none"> • You engage one of our Services. • If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services. • Our Business Partners (including their employees, contractors, and other representatives of their companies) provide it to us.

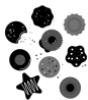
<p>this category may overlap with other categories.</p>	<ul style="list-style-type: none"> You visit our websites and social media sites or use our app. You sign up for one of our events. We receive it from other companies within our corporate group.
<p><i>Special Categories of Personal Data (as per the GDPR or similar laws)</i></p> <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Although we do not purposefully or knowingly process these categories of Personal Data, they may be inferred from the processing of Geolocation Data when:</p> <ul style="list-style-type: none"> You engage one of our Services. You use our any of our applications.
<p><i>Commercial information</i></p> <p>Records of personal property, products, or services purchased or obtained.</p>	<ul style="list-style-type: none"> If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services. Our Business Partners (including their employees, contractors, and other representatives of their companies) provide it to us. You visit our websites and social media sites or use our app. You sign up for one of our events. We receive it from other companies within our corporate group.
<p><i>Payment Data</i></p> <p>Payment instrument number, payment instrument security code.</p>	<p>If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services.</p>
<p><i>Biometric information</i></p> <p>Behavioral, or activity patterns used to extract a template or other identifier or identifying</p>	<p>When using our app. We collect behavioral data and activity patterns such as information about your driving styles, behaviors and patterns.</p>

information, such as driving data to assess driving style.	
<i>Device, Internet or other similar network activity</i> Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, device data, log and usage data.	You visit our websites and social media sites or use our app.
<i>Social Media Login Data</i> Information that is accessible to us if you choose to register your account with us using social media.	<ul style="list-style-type: none"> • You engage one of our Services. • We access it via the relevant social media platform.
<i>Application Data</i> Mobile device access, mobile device data, push notifications.	When you use our mobile app.
<i>Geolocation data</i> Physical location or movements including speed, altitude and heading of vehicle.	When using our app and from the device in the vehicle. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.
<i>Sensory data</i> Audio, electronic, visual, thermal, olfactory, or similar information.	We process these categories of Personal Data within the United States of America only, as part of our vehicle fleet dash camera Services only.
<i>Technical data</i>	<ul style="list-style-type: none"> • The device in the vehicle. • Our Business Partners (including their employees, contractors, and other

<p>Vehicle serial number or any other unique identifier of the vehicle (e.g. the vehicle license plate number, vehicle identification number (VIN)), technical data relating to the state of the vehicle and its parts, data relating to the use of the vehicle by the driver or the occupants (e.g. data relating to driving styles, mileage, life aboard the vehicle, driver behavior, odometer, seatbelt information, location etc.)</p>	<p>representatives of their companies) or their customers provide it to us.</p>
<p><i>Inferences drawn from other Personal Data</i></p> <p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior (including driving behavior and style as described above), attitudes, intelligence, abilities, and aptitudes, inferences drawn about special categories of personal data which may pertain to you as described in more detail above.</p>	<ul style="list-style-type: none"> • If you provide it directly to us when asking a question, filling in a form, making a complaint, or commenting about one of our Services. • Our Business Partners (including their employees, contractors, and other representatives of their companies) provide it to us. • You visit our websites and social media sites or use our app. • You sign up for one of our events. • We receive it from other companies within our corporate group.

We will not collect additional categories of Personal Data without informing you.

Cookies



A “cookie” is a small file stored on your device that contains information about your device. We may use cookies to provide basic relevant ads, website functionality, authentication (session management), usage analytics (web analytics), to remember your settings, and to generally improve our websites and Services.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies may remain even after you close your browser, but always have an expiration date.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). These third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our

Services or on other websites. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

If you would prefer not to accept cookies, you can change the setup of your browser to reject all or some cookies. Note, if you reject certain cookies, you may not be able to use all features of our Services. For more information, please visit <https://www.aboutcookies.org/>.

You may also set your browser to send a Do Not Track (DNT) signal or Global Privacy Control (GPC) signals. For more information, please visit <https://allaboutdnt.com/> and <https://globalprivacycontrol.org/>. Please note that our Services do not have the capability to respond to DNT signals and GPC received from web browsers. However, please note that the technology to detect whether a website honors Do Not Track and Global Privacy Control signals does not always work as intended.

For more information about our use of cookies, please see our Cookie Notice.

For What Purposes Do We Use Your Personal Data?

We may process your Personal Data for the following purposes:



- To facilitate account creation and authentication and otherwise manage user accounts. We may process your Personal Data so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your Personal Data to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your Personal Data to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your Personal Data to send you details about our products and services, changes to our terms and policies, and other similar information.
- To fulfil and manage your orders. We may process your Personal Data to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- To enable user-to-user communications. We may process your Personal Data if you choose to use any of our offerings that allow for communication with another user.

- To request feedback and to evaluate and improve our Services, products, marketing, and your experience. We may process your Personal Data when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
- To protect our Services. We may process your information or Personal Data as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- To save or protect an individual's vital interest. We may process your Personal Data when necessary to save or protect an individual's vital interest, such as to prevent harm.
- To comply with our legal obligations. We may process your Personal Data to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.
- For other business purposes. We may use your Personal Data for other business purposes, such as data analysis, identifying usage trends, and to evaluate and improve our Services, products and your experience.

How Long We Keep Your Personal Data



We retain your Personal Data for as long as needed for the purposes we collected it and any other permitted linked purpose and in accordance with our data retention policies. For example, we will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

If we use your data for multiple purposes, we keep it until the purpose with the longest retention period expires, discontinuing use for shorter periods. Our retention periods align with our business needs and industry standards.

In cases where we act as a data processor, we retain Personal Data for as long as instructed by the respective Business Partner (who typically acts as a data controller). We delete the Personal Data submitted to us by our Business Partners within three (3) years of the end of our service agreement with the Business Partner, unless applicable laws require otherwise.

Your Personal Data may need to be retained in our backup systems and will only be deleted or overwritten at a later time, normally no longer than five years from the end

of our service agreement with the Business Partner. This may be the case even when you or a Supervisory Authority has validly asked us to delete your Personal Data or when we do not no longer have a legal basis for processing such Personal Data. Please note that our backups are protected, and we have implemented a system to remind us to delete again the data when we restore a backup to production systems.

Sharing Personal Data with Third Parties



The following table describes, in the last twelve months, the categories of information we have disclosed to third parties for business purposes, and the categories of those third parties.

Category	Personal Data Disclosed for Business Purposes?	
	Yes or No	Categories of Third Parties Receiving Personal Data
Identifiers	YES	<ul style="list-style-type: none"> ● Payment processing providers; ● Messaging and communication providers; ● Cloud and hosting infrastructure providers; and ● Shipping and logistics providers.
Contact information	YES	<ul style="list-style-type: none"> ● Payment processing providers; ● Messaging and communication providers; ● Cloud and hosting infrastructure providers; and ● Shipping and logistics providers.
Special categories of personal information	YES	<ul style="list-style-type: none"> ● Payment processing providers; ● Cloud and hosting infrastructure providers; and ● Vehicle and market data providers.
Protected classification characteristics under California or federal law	YES	<ul style="list-style-type: none"> ● Cloud and hosting infrastructure providers.

Commercial information	YES	<ul style="list-style-type: none"> ● Payment processing providers; ● Messaging and communication providers; ● Cloud and hosting infrastructure providers; ● Shipping and logistics providers; and ● Accounting/ MRP business data providers.
Payment data	YES	<ul style="list-style-type: none"> ● Payment processing providers.
Biometric information	YES	<ul style="list-style-type: none"> ● Messaging and communication providers; ● Mapping and location services providers; and ● Cloud and hosting infrastructure providers.
Device, Internet or similar network activity	YES	<ul style="list-style-type: none"> ● Payment processing providers; ● Messaging and communication providers; and ● Cloud and hosting infrastructure providers.
Social media login data	YES	<ul style="list-style-type: none"> ● Cloud and hosting infrastructure providers.
Application data	YES	<ul style="list-style-type: none"> ● Messaging and communication providers; ● Mapping and location services providers; and ● Cloud and hosting infrastructure providers.
Geolocation data	YES	<ul style="list-style-type: none"> ● Messaging and communication providers; ● Mapping and location services providers; and ● Cloud and hosting infrastructure providers.

Sensory data	NO	<ul style="list-style-type: none"> • None
Technical data	YES	<ul style="list-style-type: none"> • Messaging and communication providers; and • Cloud and hosting infrastructure providers.
Inferences drawn from other Personal Data	YES	<ul style="list-style-type: none"> • Mapping and location services providers; • Cloud and hosting infrastructure providers.

International Transfers of Your Personal Data

We are a global company headquartered in the U.S., and our affiliates, our service providers and other third parties with whom we share Personal Data with operate globally.

When you use the Services, certain third parties may collect Personal Data about your online activities over time and across different websites or online services. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

International Transfers of Your Personal Data: Europe



When your Personal Data is safeguarded by the EU or UK General Data Protection Regulation, or Swiss data protection law, before sending it to parties the European Economic Area (“EEA”), the UK, or Switzerland, we will do one of two things:

- **Seek your consent;** or
- **Demand privacy and security:** We will ensure the third party maintains the same level of privacy and security for your Personal Data as we do.

In some cases, the authorities of a country may have determined that the laws of other countries, territories or sectors within a country provide a level of protection equivalent to domestic law. You can see [here](#) the list of countries, territories and specified sectors that the European Commission recognized as providing an adequate level of protection for personal data, [here](#) the list of the UK, and [here](#) the list of Switzerland.

We are accountable for the protection of your Personal Data when we transfer it to others. We either send it to a country, territory or sector within a country that is

recognized as providing the same level of personal data protection as the country of origin, or use safeguards like the [Data Privacy Framework](#), [Binding Corporate Rules](#) or the [Standard Contractual Clauses](#) (also known as the “SCCs”) approved by the European Commission under [Article 46.2 of the GDPR](#), with necessary adjustments for transfers from the UK or Switzerland, or use specific transfer instruments like the [UK International Data Transfer Agreement](#).

Other Disclosures of Your Personal Data

We may disclose your Personal Data to the extent required or allowed by law, or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings, in accordance with applicable law (whether initiated by governmental/law enforcement officials, or private parties). If we have to disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that those officials will maintain the privacy and security of your Personal Data.

We may also disclose your Personal Data if we sell or transfer all or some of our company’s business interests, assets, or both, or in connection with a corporate restructuring. Finally, we may disclose your Personal Data to our subsidiaries or affiliates, but only if necessary for business purposes, as described in the section above.

We reserve the right to use, transfer, sell, and share aggregated, anonymous data for any legal purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and customers.

What Privacy Rights Do You Have?



You have specific rights regarding your Personal Data that we collect and process. Please note that you can only exercise these rights with respect to Personal Data that we process about you when we act as a data controller or as a “business” under the CCPA. To exercise your rights with respect to information processed by us on behalf of one of our Business Partners, please read the privacy notice of that Business Partner.

In this section, we first describe those rights and then we explain [how you can exercise those rights](#).

Right to Know What Happens to Your Personal Data



This is called the right to be informed. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and who it will be shared with, among other things.

We are informing you of how we process your Personal Data with this Notice.

We will make every effort to let you know how we use your Personal Data. Yet, if we did not get your data directly from you, the GDPR does not require us to inform you in these cases: (1) When it is impossible or too costly to provide the information. (2) When the law obliges us to gather or share the data. (3) If the Personal Data must stay confidential because of professional or other secrecy obligations.

Right to Know What Personal Data Guidepoint Systems Has About You



This is called the right of access. This right allows you to (1) get confirmation of whether we process Personal Data about you (2) ask for full details of the Personal Data we hold about you and certain related information; (3) get a copy or access to the Personal Data.

You have the right to obtain from us, including confirmation of whether or not we process Personal Data concerning you, and, where that is the case, a copy or access to the Personal Data and certain related information.

Once we receive and confirm that the request came [from you](#) or [your authorized agent](#), we will disclose to you:

- The categories of your Personal Data that we process;
- The categories of sources for your Personal Data;
- Our purposes for processing your Personal Data;
- Where possible, the retention period for your Personal Data, or, if not possible, the criteria used to determine the retention period;
- The categories of third parties with whom we share your Personal Data;
- If we carry out automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- The specific pieces of Personal Data we process about you in an easily-sharable format;
- If we disclosed your Personal Data for a business purpose, the categories of Personal Data and categories of recipients of that Personal Data for disclosure;
- If we rely on legitimate interests as a lawful basis to process your Personal Data, the specific legitimate interests; and
- The appropriate safeguards used to transfer Personal Data from the EEA or the UK to a third country, if applicable.

Under some circumstances, we may deny your access request. In that event, we will respond to you with the reason for the denial.

For security and legal compliance, we cannot disclose certain sensitive information like Social Security numbers, driver's license numbers, financial account numbers, health insurance or medical IDs, passwords, or security questions and answers. However, we can inform you if we have such information without disclosing specific details.

Right to Change Your Personal Data



This is called the right to rectification. It gives you the right to ask us to correct without undue delay anything that you think is wrong with the Personal Data we have on file about you, and to complete any incomplete Personal Data.

Right to Delete Your Personal Data



This is called the right to erasure, right to deletion, or the right to be forgotten. This right means you can ask for your Personal Data to be deleted.

To request to review, update, or delete your Personal Data, please fill out and submit a [data subject access request](#).

Sometimes we can delete your information, but other times it is not possible for either technical or legal reasons. If that is the case, [we will consider if we can limit how we use it](#). We will also inform you of our reason for denying your deletion request.

Right to Ask Us to Limit How We Process Your Personal Data



This is called the right to restrict processing. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain instances, such as where you believe the data is inaccurate or the processing activity is unlawful.

Right to Ask Us to Stop Using Your Personal Data



This is called the right to object. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party). **You may also object at any time to the processing of your Personal Data for direct marketing purposes.**

We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim, both in accordance with applicable law.

Right to Port or Move Your Personal Data



This is called the right to data portability. It is the right to ask for and receive a portable copy of your Personal Data that you have given us or that you have generated by using our Services, so that you can:

- Move it;
- Copy it;
- Keep it for yourself; or
- Transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you request this information electronically, we will provide you a copy in electronic format.

Right to Withdraw Your Consent



Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw is still lawful.

If you have given consent for your details to be shared with a third party and wish to withdraw this consent, please also contact the relevant third party in order to change your preferences.

Right to Non-Discrimination



We will not discriminate against you for exercising any of your privacy rights.

How Can You Exercise Your Privacy Rights?

To exercise any of the rights described above, please submit a request by either:



1. **Calling us:**

U.S.: +1 877 477 3463 (primary)

Regional phone numbers:

Austria: +43 800 018 240
Switzerland: +41 800 561140
France: +33 756 758 951
Germany: +49 30 800982760
Italy: +39 02 0070 1153
Italy: +39 800 769 407
Mexico: +52 1 442 628 7281
Poland: +48 61 100 27 09
Sweden: +46 724 002 332



2. Contacting us by **email** at dataprivacy@guidepointsystems.com

3. **Writing** to us at:



EU:
Guidepoint Systems Europe Sp. z o. o.
Mielżyńskiego 14, 61-725 Poznań, Poland
Poznań, Województwo wielkopolskie 61-725
Poland

U.S. and Rest of the World:
25231 Dequindre Rd
Madison Heights, MI 48071
United States; or



4. **(RECOMMENDED)** Filling out [this online form](#).

Verification of Your Identity



In order to correctly respond to your privacy rights requests, we need to confirm that YOU made the request. Consequently, we may require additional information to confirm that you are who you say you are.

For requests submitted via password-protected accounts, your identity is already verified. For requests sent by other means, we will verify your identity via the following method: Confirmation of the minimum necessary elements of Personal Data we already hold about you via telephone call.

We will only use the Personal Data you provide to us in a request to verify your identity or authority to make the request.

Verification of Authority



If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, a valid power of attorney on behalf of the individual, or proof of parental responsibility or legal guardianship. Alternatively, you may ask the individual to directly [contact us](#) by using the contact details above to verify their identity with Guidepoint Systems and confirm with us that they gave you permission to submit this request.

Response Timing and Format of Our Responses



We will confirm the receipt of your request within ten (10) business days and, in that communication, we will also describe our identity verification process (if needed) and when you should expect a response, unless we have already granted or denied the request.

Please allow us up to a month to reply to your requests from the day we received your request. If we need more time (up to 90 days in total), we will inform you of the reason why and the extension period in writing.

If we cannot satisfy a request, we will explain why in our response. For data portability requests, we will choose a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without difficulty.

We will not charge a fee for processing or responding to your requests. However, we may charge a fee if we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.
- Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Privacy of Children



We do not knowingly collect, solicit data from, or market to children under 16 years of age, nor do we knowingly sell such Personal Data. By using the Services, you represent that you are at least 16 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that Personal Data from users less than 16 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 16, please contact us at rob@guidepointsystems.com

Data Integrity & Security

We are strongly committed to keeping your Personal Data safe. We have implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect your Personal Data from unauthorized processing. Unauthorized processing includes unauthorized access, exfiltration, theft, disclosure, alteration, or destruction.

Some of these measures include the following:

- encryption and redaction and we also have dedicated teams to look after information security and privacy;
- encrypting communication channels (e.g. by adding a security module of the "Hardware Security Module" type), and correctly configuring the communication channels (e.g. by renewing and securing keys);
- subjecting access to the information system that processes the data to a reliable authentication of the user;
- authenticating the various devices taking part in communication (onboard calculators, sensors, servers, users, third parties, etc.);
- the implementation of a robust and secured process for updating equipment;

- effective partitioning of the various domains and subdomains taking part in processing (the vehicle’s vital functions, communication functions, etc.) linked to implementing filtering measures;
- in the case of password-based authentication, application of the Commission’s recommendations of 22 June 2017 (cf. discussion no. 2017-190 of 22 June 2017); and
- detecting an intrusion into the information system, and the option to function in downgraded mode in case of attack.

U.S. Regulatory Oversight

Guidepoint Systems is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

Right to Lodge a Complaint with a Supervisory Authority



If the EU or UK General Data Protection Regulation applies to our processing of your Personal Data, you have the right to lodge a complaint with a supervisory authority if you are not satisfied with how we process your Personal Data.

Specifically, you can lodge a complaint in the member state of the European Union of your habitual residence, place of work, or the alleged violation of the GDPR. In the UK, you can lodge a complaint with the UK Information Commissioner’s Office.

Changes to this Notice



If we make any material change to this Notice, we will post the revised Notice to this web page. We will also update the “Effective” date.

Contact Us



If you have any questions about this Notice or our processing of your Personal Data, or want to submit a verifiable consumer request, please write to us by email at dataprivacy@guidepointsystems.com, fill out our [form](#), call

at:

U.S.: +1 877 477 3463 (primary)

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or by postal mail at:

EU:
Guidepoint Systems Europe Sp. z o. o.
Mielżyńskiego 14, 61-725 Poznań, Poland
Poznań, Województwo wielkopolskie 61-725
Poland

U.S. and Rest of the World

25231 Dequindre Rd
Madison Heights, MI 48071
United States.

Please allow up to four weeks for us to reply.

Data Protection Officer

Our Data Protection Officer (DPO) details are below. While you may contact us directly, our DPO can also be contacted on matters related to the processing of Personal Data. You may contact our DPO by email at rob@guidepointsystems.com, by phone at 8172983149, or contact us by post at:

EU:
Guidepoint Systems Europe Sp. z o. o.
Mielżyńskiego 14, 61-725 Poznań, Poland
Poznań, Województwo wielkopolskie 61-725
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