

PRIVACY POLICY

1. Background

- 1.1. www.loconav.com (“**Website**”) and the Loconav application (“**App**”) is owned, registered and operated by BT Techlabs Private Limited (“**Company**” or “**LocoNav**”), a company incorporated under the Companies Act, 2013. The Company is engaged in the business of providing vehicle tracking management services (“**VTS**”). By using the VTS and/or the Website (“**Services**”), you consent to the manner of usage, collection, storage and sharing of information collected from You as provided for in this privacy policy (“**Privacy Policy**”).
- 1.2. This Privacy Policy covers: (i) the type of information collected from the users through the Website, the VTS device, or the App, including sensitive personal data or information; (ii) the purpose, means and modes of usage of such information; and (iii) how and to whom such information which has been collected will be disclosed.
- 1.3. For the purpose of this Privacy Policy, wherever the context so requires “**You**”, “**Your**” or “**User**” shall mean any natural person who uses the Website, the VTS device, or the App for availing the Services. The term “**We**”, “**Us**”, “**Our**” shall mean the Company, its employees, and authorised agents that perform any services on the Company’s behalf.
- 1.4. We reserve the right to make changes to this Privacy Policy at any time. Any such modifications will become effective immediately upon posting to the Website, the VTS device, or the App and Your continued use of the Website, the VTS device, or the App, and/or the Services constitutes Your agreement to such modifications. You agree to periodically review the current version of the Privacy Policy as posted on the Website

2. Information collected from the User(s)

- 2.1. **Personal Information:** The Company, through the Website, the App and the VTS provides vehicle tracking services. For this purpose, LocoNav collects the following personally identifying information (“**PII**”) in a form from the Users during their use of the Website, the App or the VTS Device:
 - (i) Name of the User;
 - (ii) E-mail address;
 - (iii) Phone number;
 - (iv) Address;
 - (v) Location of the vehicle in which the VTS device is installed;
 - (vi) Information relating to the vehicle in which the VTS device is installed.
 - (vii) Credit card or debit card information which is required for payment purposes (excluding passwords, PIN numbers, CVVs etc.);
 - (viii) Billing and transaction details; and

- (ix) All other information as required by Us for the purpose of the User's use of the Website, the VTS device, or the App.

3. How the collected information will be used

3.1. The information collected by Us, shall be used for the purposes and in the manner described below:

- (i) **Registered user name:** The registered user name shall be used to customize the Services availed by the User through the Website/App and to personalize all communications that are sent to the User by Us.
- (ii) **E-mail Address:** Your E-mail address will be used for all communication from the Company, to You, in relation to the provision of Services to You.
- (iii) **Phone Number:** Phone number will be an alternative method to contact the User for any matter related to the Services to be availed by You.
- (iv) **Address:** Your address will be an alternative method to contact the User for any matter related to the Services to be availed by You.
- (v) **Location of the vehicle:** We will collect the information relating to the global positioning and location of the vehicle in which the VTS device is installed to provide VTS Services to You.
- (vi) **Information relating to the vehicle:** We will collect the information relating to the status, functioning and condition of the vehicle in which the VTS device is installed to provide VTS Services to you.
- (vii) **Credit Card/Debit Card information:** Credit Card/Debit Card information is used for charging the user for any transaction related to the Services.
- (viii) **Billing and Transaction information:** The Company would store the billing and transaction information of the Users for record-keeping, and maintenance of its accounts.
- (ix) In order to improve the quality of our Services we may ask you to provide us with information regarding your experiences with our Website, the VTS device, or the App and/or Services. Users have the option of choosing not to provide us with this information.

- (x) We may use your information to send you promotional information pertaining to the Website, the VTS device, or the App, and/or Services provided by us.
- (xi) We reserve the right to ask you, at the time of registration with the Website, the VTS device, or the App or thereafter, for documentary proof of your identity or other data or postings provided by you with respect to the registration or otherwise. In the event that you fail to provide us with this information or documentary proof, we reserve the right to refuse registration or to terminate your user agreement immediately and cease to provide any Services to you.
- (xii) The User PII collected by LocoNav is utilized by us for the analysis of the User experience on the Website, the VTS device, or the App and thereafter customize the Services offered by us through the Website, the VTS device, or the App.
- (xiii) The Company may store User PII collected during the term of the User's use of the Website, the App or the VTS Device, for such period as it may require.

4. Disclosure of Personal Information

- 4.1. All financial information that is collected through the Website, the VTS device, or the App is used solely to bill for the services availed by the user, and is not used for marketing or promotional purposes. Towards this end, we disclose such information to a third-party intermediary, for the sole purpose of credit card processing, which is used to make payments to avail the Services on our Website, the VTS device, or the App.
- 4.2. The individual User PII may be shared by LocoNav with third party intermediaries to the extent necessary for providing Services to the User. LocoNav may share anonymous aggregate information to third parties in the form of metrics, cumulative data etc.
- 4.3. We may also disclose certain information to third parties solely to help diagnose technical problems, to administer the Website, the App and the VTS, and improve the quality of the Services provided by us.
- 4.4. We reserve the right to disclose any PII as required by law and when we believe, at our sole discretion that disclosure is necessary to protect our rights, protect someone from injury and/or to comply with a judicial proceeding, court order, or legal process served on our Website, the VTS device, the App, or the Company.

5. Cookies

- 5.1. The Website or the App uses temporary cookies, which are files that your web browser puts on your system when you visit a website, to store certain information that is not sensitive personal information. The information collected through these cookies is used by us for the technical administration of the Website and the App, research and development, and to improve the quality of our Services.

- 5.2. We may use third party cookies to track visitor behaviour and to improve the quality of our Services. However, such cookies will not store any kind of personal information, nor will such information be disclosed to any third party.
- 5.3. These cookies are intended to be automatically cleared or deleted when the User quits the browser application. You are encouraged to use the “clear cookies” functionality of your browser to ensure such clearing / deletion, since it is impossible for us to guarantee, predict or provide for the behaviour of your system.
- 5.4. The information we collect with cookies is not sold, rented, or shared with any third parties, other than for internal development and maintenance of the Website and the App.

6. Third Party Links

We may provide links to websites for the convenience and information of users. These websites may not be owned, controlled, or operated by us. In those cases, we cannot control how information collected by those websites will be used, shared, or secured. If the user visits linked sites, we strongly recommend that the user reviews the privacy notices or policies posted at those sites. We are not responsible for the content of linked sites, the user’s use of them, or the information practices of their operators.

7. Security Procedures

We have implemented industry standard security policies, rules and technical measures, to protect any kind of personal sensitive information that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.

8. Retention of Information

We retain any PII that you may have provided to us, for as long as you engaged our Services, and for a reasonable time thereafter.

9. Choice/Opt-Out

- 9.1. If the user wishes to opt- out of receiving non-essential (promotional, marketing-related) communications from us, after setting up an account, they may choose to do so. Further, if a user wishes to remove all their contact information from the Website or the App, they can do so by opting out of the Website or the App and closing all accounts with the Website or the App.
- 9.2. The User information, including the User PII, collected by the Company prior to such Choice/Opt-Out by the User, may be stored, for a period of 5 (five) years from the date of Choice/ Opt-Out.

10. Transference of Services

If LocoNav or its assets are acquired, User PII would be one of the assets that is transferred or acquired by a third party.

11. Grievances

If you have any grievances as to the usage of any of your personal information or any other privacy concerns, you can contact the Grievance Officer whose details are provided herein under, who will redress any such grievance that you might have within a period of 30 (Thirty) days.

Name: Vidit Jain

Phone No: +91 9560111522

E-mail Address: vidit@babatrucks.com

Postal Address: LocoNav - BT Techlabs Pvt. Ltd.

3rd Floor, Cybiz Call International,
309-310 Udyog Vihar, Phase IV, Sec-18,
Gurugram, Haryana – 122015

12. Governing Law and Jurisdiction

The Privacy Policy shall be governed by and constructed in accordance with the applicable laws of India without reference to conflict of laws principles. Courts in New Delhi, India shall have the exclusive jurisdiction to determine any disputes arising in relation to, or under, this Privacy Policy.

13. Updates

LocoNav may change and update this Privacy Policy from time to time. Should the User have any questions regarding the content, please feel free to contact us at 9654394082.