

DATA PRIVACY POLICY

Version 2.0 | March 2026

Kvadrat Systems L.L.C

1. INTRODUCTION AND SCOPE

Kvadrat Systems L.L.C ("Kvadrat Systems," "we," "us," or "our"), a limited liability company registered in Dubai, United Arab Emirates (Trade License No. 674763, TDR Certificate No. DA35806/14), is committed to protecting the privacy and security of personal data.

This Data Privacy Policy ("Policy") describes how we collect, use, store, share, and protect personal data in connection with our vehicle tracking systems, GPS/IoT solutions, BLE/Rfid asset management platforms, security systems, and related technology services (collectively, the "Services").

This Policy applies to: (a) customers and their authorized users (both businesses and individuals); (b) end-users of systems deployed by our customers (including drivers, fleet operators, and employees); (c) website visitors; (d) business contacts and partners; and (e) any other individuals whose personal data we process in connection with the Services.

We comply with: the **UAE Personal Data Protection Law** (Federal Decree-Law No. 45 of 2021 and its Executive Regulations, "UAE PDPL"); the **EU General Data Protection Regulation** (Regulation (EU) 2016/679, "GDPR"), where applicable; the **California Consumer Privacy Act** as amended by the CPRA ("CCPA"); and all other applicable data protection laws.

2. DATA CONTROLLER

Entity	Kvadrat Systems L.L.C
Registered Address	Business Bay, P.O. Box 27795, Dubai, UAE
Trade License No.	674763
TDR Certificate	DA35806/14 (valid through October 2029)
Telephone	+971-4-4387030
Privacy Email	privacy@kvadratsystems.com
DPO / Data Protection Contact	dpo@kvadratsystems.com

Where we process personal data on behalf of our customers (as a data processor), our customers act as the data controller, and the terms of our Data Processing Agreement (DPA) apply.

3. CATEGORIES OF PERSONAL DATA

3.1 Data You Provide Directly

- Identity Data:** Full name, job title, company name, government-issued identification (where legally required).
- Contact Data:** Email address, telephone number, postal address, business address.
- Account Data:** Username, password (stored in encrypted/hashed form), account preferences.
- Financial Data:** Billing address, payment details (processed via PCI-DSS compliant processors), purchase records.
- Contractual Data:** Information in contracts, purchase orders, service agreements, and correspondence.

3.2 Data Collected Automatically

- Precise Geolocation Data:** GPS coordinates, speed, heading, altitude, geofence events. *This may constitute sensitive personal data under certain jurisdictions (including under CCPA). We treat geolocation data with heightened safeguards.*
- Device and Telemetry Data:** Device identifiers (IMEI, serial numbers), firmware versions, connectivity status, signal strength, battery levels, ignition status, fuel data, OBD/CAN-bus diagnostic data (where applicable).
- Usage Data:** Login timestamps, feature usage patterns, API call logs, session data, platform interactions.
- Technical Data:** IP address, browser type/version, operating system, device type, language preference, time zone.
- Cookie and Tracking Data:** As described in Section 12 below.

3.3 Data from Third Parties

- **Business Partner Data:** Information from our technology partners, distributors, and hardware suppliers for order fulfillment and service delivery.
- **Publicly Available Data:** Information from public business registries, professional networks, and similar public sources.

4. LAWFUL BASIS FOR PROCESSING

Lawful Basis	Description	Examples
Contractual Necessity (GDPR Art. 6(1)(b); UAE PDPL Art. 5)	Processing necessary for performance of a contract or pre-contractual steps.	Providing tracking/IoT services; managing accounts; processing orders; hardware fulfillment; technical support.
Consent (GDPR Art. 6(1)(a); UAE PDPL Art. 5)	You have given explicit, specific, informed, and freely given consent.	Marketing communications; non-essential cookies; processing of sensitive categories beyond what is strictly necessary.
Legitimate Interests (GDPR Art. 6(1)(f))	Processing necessary for our legitimate business interests, balanced against your rights.	Service improvement; fraud prevention; IT security; business analytics using aggregated/anonymized data.
Legal Obligation (GDPR Art. 6(1)(c); UAE PDPL)	Processing necessary to comply with legal obligations.	Tax/VAT reporting; TDRA/SIRA regulatory compliance; responding to lawful government/court orders.
Vital Interests (GDPR Art. 6(1)(d))	Processing necessary to protect vital interests of an individual.	Emergency location tracking in safety-critical situations (where applicable and deployed by the Controller).

5. PURPOSES OF PROCESSING

- **Service Delivery:** Operating our IoT/GPS tracking platforms, providing real-time location data, alerts, geofence management, reporting, and analytics.
- **Account Management:** Creating and managing accounts, authenticating users, administering subscriptions.
- **Hardware Fulfillment:** Processing orders, managing logistics, delivering and configuring devices.
- **Payment Processing:** Processing payments, managing billing, issuing invoices.
- **Technical Support:** Troubleshooting, resolving issues, maintaining service quality.
- **Communication:** Responding to inquiries, sending service notifications (maintenance, outages, updates).
- **Product Improvement:** Analyzing usage patterns using **aggregated and anonymized data only** to improve platforms and develop new features.
- **Marketing:** With your consent, sending promotional communications. You may opt out at any time.
- **Legal and Regulatory Compliance:** Complying with UAE laws, TDRA/SIRA regulations, tax obligations, court orders, and other legal requirements.
- **Security and Fraud Prevention:** Protecting against unauthorized access, detecting threats, maintaining system integrity.

6. DATA SHARING AND DISCLOSURE

We do not sell your personal data. We may share personal data with the following categories of recipients, solely for the purposes described in this Policy:

Recipient Category	Purpose	Safeguards
Cloud hosting providers	Infrastructure, data storage	DPA with GDPR-equivalent protections; encryption; access controls
Payment processors	Payment processing	PCI-DSS certified; DPA; data minimization
Technology partners	Service delivery and support	DPA; contractual confidentiality; access limited to necessity
Professional advisors	Legal, audit, accounting services	Professional confidentiality obligations; engagement letters
Regulatory authorities (TDRA, SIRA, UAE Data Office)	Legal/regulatory compliance	As required by law; limited to legally mandated disclosures
Courts, law enforcement	Legal proceedings, lawful requests	Only upon valid legal process; Controller notified where permissible

Business transfer parties	Merger, acquisition, restructuring	Successor assumes equivalent data protection obligations; notice provided
---------------------------	------------------------------------	---

All third-party recipients are bound by appropriate contractual and/or legal obligations to protect personal data. A current list of sub-processors is available upon request.

7. INTERNATIONAL DATA TRANSFERS

As a company operating internationally with customers across the UAE, Europe, Africa, and other regions, we may transfer personal data outside the UAE and/or the European Economic Area (EEA). We ensure appropriate safeguards are in place for all such transfers:

- **EU Standard Contractual Clauses (SCCs):** For transfers of EEA personal data to the UAE or other third countries without an adequacy decision, we use the SCCs approved by European Commission Implementing Decision (EU) 2021/914.
- **Adequacy Decisions:** Transfers to countries recognized as providing adequate data protection by the European Commission or UAE authorities.
- **UAE PDPL Requirements:** Compliance with cross-border transfer requirements as imposed by the UAE Data Office, including ensuring the recipient country provides adequate protection or implementing appropriate safeguards.
- **Supplementary Measures:** Where necessary (per EDPB Recommendations 01/2020 following the Schrems II decision), we implement additional technical measures (such as encryption with controller-held keys) and organizational measures.

For details on specific transfer mechanisms applicable to your data, contact dpo@kvadratsystems.com.

8. DATA RETENTION

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by applicable law. Our retention periods:

Data Category	Retention Period	Post-Retention Action
Account and contract data	Duration of contract + 6 years	Secure deletion or anonymization
Financial / billing records	7 years from transaction	Secure deletion (UAE Commercial Transactions Law)
GPS / telemetry data	As agreed in service contract. Default: 12 months rolling	Secure deletion or irreversible anonymization
OBD / CAN-bus diagnostic data	As agreed. Default: 6 months	Secure deletion
Technical support logs	3 years from last interaction	Secure deletion
Marketing consent records	Until consent withdrawn + 2 years	Secure deletion (proof of consent retention)
Website analytics / cookies	See Section 12	Automatic expiry per cookie type
Security / access logs	12 months minimum	Secure deletion (or longer if required for incident investigation)

Upon expiration of the applicable retention period, personal data will be securely deleted using methods that render recovery infeasible, or irreversibly anonymized. Where immediate deletion is not technically feasible (e.g., backup archives), data will be isolated and protected until deletion is possible.

9. YOUR RIGHTS AS A DATA SUBJECT

Subject to applicable law and certain limitations, you have the following rights:

Right	Description	Legal Basis
Access	Request confirmation of whether we process your data and obtain a copy.	GDPR Art. 15; UAE PDPL; CCPA
Rectification	Request correction of inaccurate data or completion of incomplete data.	GDPR Art. 16; UAE PDPL
Erasure ("Right to be Forgotten")	Request deletion of data where no longer necessary, consent withdrawn, or unlawfully processed.	GDPR Art. 17; UAE PDPL
Restriction	Request restriction of processing while accuracy is contested or processing is unlawful.	GDPR Art. 18

Data Portability	Receive your data in a structured, commonly used, machine-readable format.	GDPR Art. 20
Objection	Object to processing based on legitimate interests or direct marketing.	GDPR Art. 21
Withdraw Consent	Withdraw consent at any time (without affecting lawfulness of prior processing).	GDPR Art. 7(3); UAE PDPL
Opt-Out of Sale/Sharing	Opt out of sale or sharing of personal information (we do not sell data).	CCPA Sec. 1798.120
Limit Use of Sensitive Data	Request we limit use of sensitive personal information to specified purposes.	CCPA Sec. 1798.121
Non-Discrimination	We will not discriminate against you for exercising any privacy right.	CCPA Sec. 1798.125
Lodge a Complaint	File a complaint with a supervisory authority (UAE Data Office, EU DPA, CA AG).	GDPR Art. 77; UAE PDPL

How to Exercise Your Rights: Submit your request to dpo@kvadratsystems.com. We will verify your identity and respond within: 30 days (GDPR/UAE PDPL) or 45 days (CCPA), with permitted extensions. Requests are free of charge, except where manifestly unfounded or excessive.

10. DATA SECURITY

We implement appropriate technical and organizational measures to protect personal data, including:

- **Encryption:** AES-256 for data at rest; TLS 1.2+ (TLS 1.3 preferred) for data in transit.
- **Access Controls:** Role-based access (RBAC), multi-factor authentication (MFA), principle of least privilege.
- **Network Security:** Firewalls, IDS/IPS, DDoS protection, network segmentation.
- **Monitoring:** 24/7 SIEM monitoring, comprehensive audit logging, anomaly detection.
- **Personnel:** Mandatory annual data protection training; background checks; confidentiality obligations.
- **Incident Response:** Documented plan with defined escalation procedures, tested annually.
- **Business Continuity:** Automated encrypted backups; disaster recovery (RTO 4h, RPO 1h).
- **Third-Party Security:** Due diligence assessments, contractual security obligations, and ongoing monitoring of all sub-processors.
- **Vulnerability Management:** Annual penetration testing; quarterly vulnerability scanning; timely patch management.

11. DATA BREACH NOTIFICATION

In the event of a personal data breach posing a risk to your rights and freedoms, we will:

- Notify the relevant Supervisory Authority **without undue delay and within 72 hours** of becoming aware (GDPR Art. 33);
- Notify affected Data Subjects **without undue delay** where the breach is likely to result in a high risk (GDPR Art. 34);
- Comply with UAE PDPL breach notification requirements to the UAE Data Office and affected individuals;
- Comply with CCPA breach notification requirements for California residents;
- Maintain a comprehensive breach register documenting all incidents, effects, and remedial actions.

12. COOKIES AND TRACKING TECHNOLOGIES

Our websites and platforms use cookies and similar technologies. We categorize them as follows:

Cookie Type	Purpose	Consent Required	Typical Duration
Strictly Necessary	Essential website/platform functionality and security	No (legitimate interest)	Session or up to 12 months
Performance / Analytics	Understanding visitor behavior, page views, load times	Yes	Up to 24 months
Functional	Enhanced functionality, personalization, language preferences	Yes	Up to 12 months
Marketing / Advertising	Delivering relevant ads, measuring campaign effectiveness	Yes (explicit consent)	Up to 12 months

Managing Cookies: You can manage preferences via our cookie consent banner (displayed on first visit), through your browser settings, or by contacting us. We honor **Global Privacy Control (GPC)** signals and **Do Not Track (DNT)** browser requests.

13. GPS AND LOCATION DATA TRANSPARENCY

Given the nature of our Services, we collect and process **precise geolocation data** (GPS coordinates) which may constitute sensitive personal data under certain laws (including CCPA). We want to be transparent about this processing:

- **What we collect:** Real-time GPS coordinates, speed, heading, altitude, and related telemetry from devices installed in vehicles or assets.
- **Why:** To provide the tracking, fleet management, and asset monitoring services contracted by our customers.
- **Who controls it:** Our customers (as data controllers) determine the purposes and scope of location tracking. We process this data on their behalf as a data processor.
- **Accuracy:** GPS data is provided on an "as-available" basis. Accuracy depends on satellite availability, atmospheric conditions, device positioning, and cellular/network connectivity. We do not guarantee 100% accuracy, timeliness, or completeness of location data.
- **Your rights:** If your employer or service provider uses our tracking services, you may exercise your data subject rights by contacting that entity (the data controller) directly, or by contacting us at dpo@kvadratsystems.com.
- **Retention:** GPS data is retained as specified in the service agreement (default: 12 months rolling), after which it is securely deleted or irreversibly anonymized.

14. CHILDREN'S PRIVACY

Our Services are not directed to individuals under the age of 18. We do not knowingly collect personal data from children. If we become aware that we have inadvertently collected such data, we will promptly delete it. Contact dpo@kvadratsystems.com if you believe we have collected data from a minor.

15. AUTOMATED DECISION-MAKING AND PROFILING

We may use automated processing for operational purposes (geofence alerts, anomaly detection, automated billing). We do not engage in automated decision-making that produces legal or similarly significant effects without human oversight. You have the right to request human review of any automated decision affecting you.

16. CALIFORNIA-SPECIFIC DISCLOSURES (CCPA/CPRA)

- Categories of personal information collected in the preceding 12 months are disclosed in Section 3.
- **We do not sell personal information** as defined by the CCPA.
- We do not share personal information for cross-context behavioral advertising.
- Categories of third parties and purposes of disclosure are in Section 6.
- You have rights to access, deletion, correction, and opt-out (Section 9).
- You may limit use/disclosure of sensitive personal information (including precise geolocation).
- We will not discriminate against you for exercising CCPA rights.
- To submit a verifiable consumer request: dpo@kvadratsystems.com.
- Authorized agents may submit requests with valid power of attorney or written authorization.

17. THIRD-PARTY LINKS AND INTEGRATIONS

Our Services may contain links to third-party websites or integrate with third-party services. We are not responsible for the privacy practices of third parties. We encourage you to review their privacy policies before providing personal data.

18. UPDATES TO THIS POLICY

We may update this Policy from time to time. We will notify you of material changes by: (a) posting the updated Policy on our website with a new version number and effective date; (b) sending email notification for significant changes; and/or (c) providing in-platform notification. Your continued use of the Services after changes constitutes acceptance. We review this Policy at least quarterly.

19. COMPLAINTS PROCEDURE

If you are unhappy with how we handle your personal data, you have the right to:

- Contact our Data Protection Contact at dpo@kvadratsystems.com. We will acknowledge your complaint within 5 business days and aim to resolve it within 30 days.

- Lodge a complaint with the **UAE Data Office** (for UAE PDPL matters).
- Lodge a complaint with the relevant **EU/EEA Data Protection Authority** (for GDPR matters).
- Lodge a complaint with the **California Attorney General** or the **California Privacy Protection Agency** (for CCPA matters).

20. CONTACT US

Data Protection Officer / Contact	dpo@kvadratsystems.com
General Privacy Inquiries	privacy@kvadratsystems.com
Postal Address	Kvadrat Systems L.L.C, Business Bay, P.O. Box 27795, Dubai, UAE
Telephone	+971-4-4387030

*End of Data Privacy Policy v2.0 | Kvadrat Systems L.L.C | Business Bay, P.O. Box 27795, Dubai, UAE
This document should be reviewed by qualified legal counsel.*