

Fleetio
Privacy Policy for Employees, Contractors, and Job Applicants

Effective Date: November 27, 2023	Policy Owner: People Operations
Responsible Department: Human Resources	

PURPOSE

Rarestep, Inc., trading as “Fleetio,” and its affiliates and subsidiaries (“we” “our” “us” or “Fleetio”) are committed to the privacy and protection of the Personal Information (defined below) entrusted to us by our customers and employees. This Employee Data Privacy Policy (the “Policy”) describes how and when we collect, access, use, or disclose (collectively, “process”) your Personal Information before, during and after your working relationship with us.

SCOPE

This Policy applies to all employees, temporary employees, interns, consultants or contractors of Fleetio. Information about how we process the personal information of Fleetio customers and website visitors is available through the link that is displayed in the footer of Fleetio’s website.

In this Policy, we refer to “Personal Information,” which is information that identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an employee, job applicant, or contractor.

NOTICE AT COLLECTION OF PERSONAL INFORMATION

1. INFORMATION WE COLLECT ABOUT YOU

We collect the following categories of Personal Information:

- Identifiers/contact information, such as employee ID number, social security number, passport number and other government-issued identification numbers, e-mail address, and home and work address.
- Professional or Employment-Related Information, such as:
 - Prior employment history and references;
 - Emergency contact details, in case we need to contact another person on your behalf;
 - Organizational data, such as job title, employee photo, work location, division, department, and position level;
 - Contract data, such as contract type, hire date, end date, non-disclosure agreements, reason for termination;

- Compensation information, such as payroll records; bank account information; amount, currency, and number of payments per year; details for participation in and administration of an equity plan, and applicable bonus and incentive plans;
 - Information relating to your work relationship with Fleetio, such as skills, qualifications, performance, promotions, demotions, discipline;
 - Leave and attendance information;
 - Expense administration, such as expense reports and expense evidence entries;
 - Benefits-related information, such as enrollment in employee benefits programs, contributions to health insurance, pension contributions, and your dependents' ages and genders;
 - Performance evaluations, ratings, and other performance data;
 - Training information, such as training courses performed; and
 - Background check records, such as criminal records checks for employees.
- Personal information described in Cal. Civ. Code 1798.80(e), such as address and phone number.
 - Characteristics of Protected Classifications under Federal or California Law, such as your gender, date of birth, citizenship, marital status, or immigration status.
 - Internet or other Electronic Network Activity Information, such as your system ID, access rights, network usage data, information generated through your use of Fleetio computer and communications equipment, including emails and instant messaging, for purposes of administering your work relationship with Fleetio as well as closed-circuit television (CCTV) footage from CCTV cameras which we may utilize in public spaces in our building, and any other information that we may collect or process about your use of Fleetio networks, systems, or managed devices. We treat any communications that we collect when monitoring our networks and systems as sensitive personal information in accordance with applicable law.
 - Education Information, such as education history and accomplishments.
 - Inferences drawn from the above categories of personal information.
 - **Sensitive Personal Information:** Certain information that we collect may be considered "sensitive personal information" or "sensitive data," including:
 - Ethnicity (such as information about a person's racial or ethnic origin);
 - Health information (such as medical questionnaires, results from drug testing, medical reports, sickness absence records, leave records (maternity, paternity, absences, compassionate), display screen equipment and risk assessment information (such as risk assessments for expectant mothers, night shift workers, individuals with injuries/health issues), and medical certificates) for limited purposes and in accordance with applicable law;

- Communications (such as the contents of your mail, email, and text messages); and
- Biometric identifiers (such as fingerprints, retina or iris scans, voiceprints or the scan of your hand or face geometry).

2. HOW WE USE YOUR INFORMATION

We will process your Personal Information when we have a legitimate business need and a legal basis to do so. Specific processing purposes that are in our legitimate interests or are necessary to perform our employment contract with you are to:

- Establish and maintain the employment or contractor relationship, including payroll and benefits administration.
- Comply with our recordkeeping, tax, auditing, and other legal obligations.
- Manage company personnel and our business.
- Evaluate job performance.
- Perform conflict of interest analysis.
- Deliver training and career development opportunities.

We process your Personal Information for additional purposes based on our legitimate interests, such as to:

- Protect the security of our networks, devices, and facilities, including by monitoring your use of and communications through Fleetio's systems.
- Prevent fraud.
- Analyze employee retention and plan staffing levels.

We will not process Personal Information for any other purpose incompatible with the purposes outlined in this section, unless such processing is required or authorized by law; is authorized by you; or is necessary to protect human life, safety or property, to improve public health, or to comply with domestic or international legal processes or government requests.

Our processing of certain Personal Information will continue even after you have left Fleetio. We will endeavor not to keep Personal Information longer than necessary for the fulfillment of the purposes outlined in this section and in accordance with Fleetio's records retention practices.

More stringent rules apply to the processing of sensitive personal information or special categories of personal data, as each is defined by applicable law. We will only process such sensitive or special categories as permitted by applicable law.

In accordance with applicable law we may conduct pre-employment screening which may include a background check and drug testing for employment purposes. As part of this pre-employment screening, information pertaining to the process is provided.

If you decline to provide any requested or required information, it may impact your employment status, and/or you may not be able to take full advantage of the benefits and other offerings we provide as part of your work relationship with Fleetio.

3. SALES AND SHARING OF PERSONAL INFORMATION

We do not “sell” or “share” your Personal Information as these terms are defined in applicable law.

4. RETENTION

Fleetio will retain personal data only for as long as needed for a legitimate interest, to fulfil the employment contract or perform a service at your request, or to meet a legal requirement, after which Fleetio will take steps to delete the information or hold it in a form that is no longer identifiable.

POLICY STATEMENT

1. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We or processors generally collect your Personal Information directly from you. We may also collect your Personal Information from your previous employer or references, or from third parties, such as employment agencies or background check agencies. We combine the information we receive from and about you.

2. HOW WE DISCLOSE YOUR INFORMATION

We limit access to Personal Information to certain individuals within Fleetio:

- Subsidiaries’ managerial, finance, and human resources personnel in each geographical region will have access to certain Personal Information of employees located in that geographical region in order to perform the functions described above.
- Fleetio’s senior management staff and human resources personnel have access to Personal Information of employees and contractors on a need to know basis.
- Designated technical personnel of Fleetio and its subsidiaries also have access to Personal Information for the purpose of maintaining technical support for the databases that contain such Personal Information.
- Fleetio personnel generally will have access to business contact information, such as workplace telephone numbers, addresses and email addresses.

Since certain business and human resources responsibility for all Fleetio employees partially rests within the United States, Canada, and Mexico, your Personal Information may be transferred to those local country subsidiaries.

We also may share your Personal Information with our authorized processors.

We will only disclose your Personal Information to other third parties in the following circumstances:

- When required to do so by law, such as in response to inquiries or requests from government authorities or to respond to judicial process in the countries in which we operate;
- In response to a legitimate request for assistance by the police or other law enforcement agency;
- To seek legal advice from our external lawyers or in connection with litigation with a third party or other legal matter;
- To provide health and wellness services to you, such as benefits and employee assistance programs;
- In connection with a corporate transaction, such as a sale, purchase, or merger of part or all of our business; and/or
- To provide a third party (such as a potential supplier or customer) with a means of contacting you in the normal course of business, for example, by providing your business phone number and email address.

3. STORING AND SAFEGUARDING YOUR INFORMATION

This Policy describes the legal, organizational, and technical measures employed to protect Personal Information consistent with applicable data protection laws. Recipients of Personal Information, including any non-affiliated entities we retain to perform functions of the nature described in the “How We Share Your Information” section, are required to protect Personal Information.

Your Personal Information is stored on servers in the United States.

In the event that we transfer Personal Information from the EEA, UK, or another jurisdiction that regulates cross-border Personal Information transfers, we will adopt measures that provide adequate protection of the Personal Information that is transferred.

To find out more about the technical and organizational measures we use to safeguard your Personal Information (including obtaining a copy of such safeguards), please visit <https://trust.fleetio.com>, or email us at security@fleetio.com.

4. YOUR DATA PROTECTION RIGHTS

We respect your privacy rights and provide you with reasonable access to the Personal Information that you may have provided as part of your employment with Fleetio. **If you are an employee residing in California**, please see the section “California-Resident Employees” below.

Personnel files are the property of Fleetio and are kept in the Human Resources Department. The personnel file generally includes such information as the employee's job application, resume, benefit information, performance appraisals, changes in personal status, and other employment records. Employee personnel files and certain other employee records are confidential and may not be disclosed except to appropriate personnel on a need-to-know basis or when required by law.

Non-EEA/Mexico Residents: An employee who wishes to review his or her own file may contact their Human Resources representative. With reasonable advance notice, employees may review their personnel files in our offices and in the presence of an individual appointed by Fleetio to maintain the files. Employees may take notes related to documents in their personnel file; however, no alterations of these records are permitted, nor can a document be added to or removed from the file at the time of an employee's review. Employees may request copies of their personnel files and any requests for copies must be in writing, unless otherwise required by law.

EEA/Mexico Residents: As a resident of the EEA or Mexico, you have the following rights, subject to some limitations:

- The right to request information about our use of your personal data;
- The right to review and access your personal data;
- The right to rectify, correct or modify the personal data we hold about you;
- The right to erase your personal data;
- The right to restrict our use of your personal data;
- The right to object to our use of, or certain types of disclosures of, your personal data;
- The right to receive your personal data in a useable format and transmit it to a third party.

Additionally, you have the right to submit feedback to your national data protection supervisory authority. If you would like to exercise any of these rights, please send a request to privacy@fleetio.com.

Where GDPR or similar legal requirements apply, you also have the right to withdraw consent you have given to uses of your personal data. If you wish to withdraw consent that you have previously provided, you may do so by writing to us at privacy@fleetio.com.

5. CALIFORNIA-RESIDENT EMPLOYEES

If you are an employee residing in California, you are entitled to the following privacy rights:

- **Right to Know:** You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- **Right to Delete:** You may request that we delete the Personal Information that we have collected from or about you. Note that there are some reasons when we will not be able to fully address your request, such as to perform a contract, to detect and protect against fraudulent and illegal

activity, to maintain for internal purposes, to comply with a legal obligation or to exercise our rights, including our rights as your employer.

- **Right to Correct:** You have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.
- **Right to Non-Discrimination:** You have a right not to receive discriminatory treatment from us for exercising your privacy rights conferred by California law.

Use and Disclosure of Sensitive Personal Information. To the extent that we collect, use, or share “sensitive personal information” as that term is defined in applicable California privacy laws, we limit our collection, use or disclosure of such information for permitted business purposes.

How to Submit a Request. To take advantage of your right to know, delete, or correct under California law, please email privacy@fleetio.com. We may request certain information to verify your identity before we can respond to your privacy rights request.

Authorized Agent Requests. You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you’ve authorized them to act on your behalf. Fleetio retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent’s identity.

When you exercise your privacy rights you have the right not to receive discriminatory treatment by Fleetio for the exercise of such privacy rights.

6. CHANGES TO THIS POLICY

We reserve the right, in our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Policy at any time. We will communicate any revisions and post the revised policy internally.

7. QUESTIONS ABOUT THIS POLICY?

Please contact via email at privacy@fleetio.com if you have questions or concerns regarding this Policy or how we process your Personal Information, or for information on exercising your rights as described above.