

## CalAmp Data Privacy Framework Statement

Effective: August 7, 2024

### Participation

CalAmp Corp, our subsidiaries including CalAmp Wireless Networks Corporation, Synovia Solutions LLC, and LoJack Global LLC (collectively “CalAmp,” “we”, “us”, or “our”) comply with the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce (collectively the “Principles”). CalAmp has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (“EU-U.S. DPF Principles”) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. CalAmp has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (“Swiss-U.S. DPF Principles”) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles (collectively, the “DDPF Principles”), the DPF Principles shall govern. Please visit <https://www.dataprivacyframework.gov/> to view our certification or learn more about the Data Privacy Framework (DPF) program.

### Scope

In this Statement, CalAmp provides information about how we collect, use, process, and transfer personal data. We are a global organization sharing the data we manage across businesses (legal entities), business processes, and information systems around the world, including personal data. Where we use the term “personal data” in this Statement we mean information from which you may be identified directly (from that information alone), and, indirectly (when different pieces of information are combined). It does not include data where information that could identify you (directly or indirectly) been removed (anonymized data).

### Types of Personal Data

In the context of providing services to business customers, CalAmp collects and processes certain data. Categories of data CalAmp processes are the following:

- Personal and identification data (name, date of birth, place of birth, nationality, tax code, VAT number);
- Contact data (address, e-mail address, IP address and telephone number);
- Data required for the management of administrative, accounting, tax and financial processes;
- Data of a vehicle on which the services are provided for:
- Characteristics of the vehicle (model, number plate and any similar data);
- GPS position of the vehicle in real time;
- Vehicle routes, km/miles, travel speed, stopping times;

- Vehicle status in real time (fuel and/or battery level, in the case of electric or hybrid vehicles, opening or closing of windows, doors, boot and bonnet, operation of the audible alarm system and engine immobilisation, if any, vehicle movement without the Customer's recognition device, removal of the vehicle's battery connection and any other similar vehicle data).

We collect and process personal data in accordance with the Principles. We commit to subject to the Principles all personal data received from the EU in reliance on the EU-US DPF. You have choices about the personal data we collect. When you are asked to provide personal data to us, you may choose not to. But if you decline to provide personal data, your ability to use the applicable services may be diminished or restricted.

### **Collection Purposes, Use of Personal Data**

We collect and process personal data with your consent (where required), and/or as necessary to provide services you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, to take steps to develop and grow our business. The purposes for which we collect and use personal data include:

- Theft management and recovery of stolen vehicles;
- Telematics services (including but not limited to: continuous position tracking with the car running, alert message to the customer in the event of unauthorised movement, information on speed, acceleration, average km travelled, driving data, distance travelled and hard braking, collection of further statistical analysis on vehicle use and accessories);
- Management of administrative, accounting, tax and financial processes;
- Protection of contractual rights and defence/exercise of rights in court (including related prodromal activities);
- Management of subscribers and renewal of subscriptions when they expire;
- Service/maintenance management resulting from technical problems with the device;
- Welcome call in LoJack activities and further data entry;
- Participation in surveys and questionnaires;
- Marketing activities, i.e. sending of informative and promotional newsletters.

### **Disclosures of Personal Data**

We access your personal data within CalAmp and the CalAmp group of companies which includes LoJack Italia, LoJack Espana, and Tracker UK. We and our group companies share personal data with third party vendor or service providers, including payment processors, data hosting providers, analytics providers, that process the data on our behalf for the purposes set forth in this Statement. We may also offer training or other services to the employees and workers of our business customers. In such cases, we may share personal data relating to the use of our training and other services with the identified business customers for their business use. We may also share your personal data with third parties such as professional advisors or banks and accountants, as permitted or required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings. We may share or transfer your personal data in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business. Finally, we may also share your personal data where you have granted us permission.

CalAmp will only disclose personal data to third parties that have given contractual assurances that they will provide at least the same level of privacy protection as is required by this Statement and the Principles. If CalAmp has knowledge that a third party to which it has disclosed personal data covered by this Statement is processing such personal data in a way that is contrary to this Statement, CalAmp will take steps to prevent or stop such processing. CalAmp complies with the principles for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions and the Principles.

### **Retention**

We retain personal data while your account is active, as needed to provide you Services. We will, also, retain personal data as necessary to comply with our legal obligations, as legally permitted, resolve disputes, and enforce our agreements.

### **Security**

We take reasonable steps to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These measures take into account the risks involved in the processing, the nature of the personal data, and the state of the art and best practices in the industry for security and data protection

### **Access**

You have the right under certain circumstances:

- to find out what information we hold about you;
- to be provided with a copy of your personal data;
- to request the correction or deletion of your personal data;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing (as mentioned above);
- to request that your provided personal data be moved to a third party; or
- you may opt out at any time from allowing further access by us to your location data, however this may mean we cannot supply some Services to you.

Your right to withdraw consent:

- Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time.

You can exercise the rights listed above at any time by contacting us using the information provided below, or, by filling out the form provided by TrustArc Inc. by clicking the “Contact Us” hyperlink below.

## **CONTACT US**

CalAmp’s DPF-consistent human resources privacy policy can be found at [www.calamp.com/wp-content/uploads/2022/08/Data-Privacy-Notice-English.pdf](http://www.calamp.com/wp-content/uploads/2022/08/Data-Privacy-Notice-English.pdf).

## **Enforcement**

Inquiries and complaints relating to CalAmp’s treatment of personal data and its compliance with the Principles may be directed to [privacy@CalAmp.com](mailto:privacy@CalAmp.com) or the following address:

CalAmp Corp.  
Attn. Privacy Counsel  
15635 Alton Parkway  
Suite 250  
Irvine, California, U.S.A. 92618

We will respond to any such inquiries or complaints within sixty (60) days. In the event that CalAmp fails to respond, or its response is insufficient or does not address the concern, we have registered with JAMS to provide independent third party dispute resolution at no cost to the complaining party. To contact JAMS and/or learn more about the company’s dispute resolution services, including instructions for submitting a complaint, please visit: <https://www.jamsadr.com/dpf-dispute-resolution>. Complaining parties may also, in absence of a resolution by CalAmp and JAMS, seek to engage in binding arbitration.

You also have the right to make a complaint to a personal data protection supervisory authority. CalAmp will cooperate with the United States Federal Trade Commissions and any data protection authorities of the EU Member States (“DPAs”) and/or the Swiss Federal Data Protection and Information Commissioner (“Commissioner”) in the investigation and resolution of complaints that cannot be resolved between CalAmp and the complainant that are brought to a relevant DPA.

## **Authority**

CalAmp is subject to the authority of the United States Federal Trade Commission.

## **Required Disclosure**

CalAmp may be required to disclose personal data to the extent required to meet a legal obligation, including national security or law enforcement obligations and applicable law, rule, order, or regulation.