

PRIVACY POLICY

Fleetx Technologies Private Limited ("Fleetx") has created this Privacy Policy in order to demonstrate that it is committed to implementing measures designed to protect the privacy of those using our services and accessing this website <https://www.fleetx.ai/> (the "Website"). This Privacy Policy is governed by the Digital Personal Data Protection Act, 2023 ("DPDPA") and applicable rules thereunder, together with other applicable laws, including the Information Technology Act, 2000 and rules made thereunder, to the extent applicable to cybersecurity and data security practices.

The domain name <https://www.fleetx.ai/> is owned by Fleetx, a company incorporated under the Companies Act, 2013, with its registered office at 3rd Floor, Tower A, Unit 320-339, 346-348, Vatika Business Park, Gurugram 122018, Haryana.

Effective date: 2026-07-30. Version: V2.0. In accordance with Section 5(3) of the DPDPA, this Privacy Policy and every consent notice issued by Fleetx is made available in [English](#) and [Hindi](#) as per Eighth Schedule of the constitution of India, accessible at <https://www.fleetx.ai/privacy-policy> or on request at grievance@fleetx.ai.

Fleetx Technologies Private Limited is the Data Fiduciary that determines the purpose and means of processing the Personal Data described in this Privacy Policy, and is accountable for compliance with the DPDPA in respect of such processing. References to "Fleetx" include its directors, officers and employees acting on its behalf. Affiliates and associate companies are separate entities, and any sharing of Personal Data with them is a disclosure governed by Section 6 of this Privacy Policy and takes place only for the purposes stated in Section 3.

The following discloses our information gathering, usage and dissemination practices for the Website. Where consent is the lawful basis for processing, Fleetx shall obtain free, specific, informed, unconditional and unambiguous consent through a clear affirmative action before processing your Personal Data, except where processing is permitted under the DPDPA for certain legitimate uses. Please note that our Website may contain links to websites of other organisations, and when you access such external links, they may have different privacy policies specific to those websites. We encourage you to read all privacy policies posted on the websites that you visit. If you do not agree with any terms of this Privacy Policy, please do not use this Website or submit any Personal Data to Fleetx. Fleetx Technologies Private Limited acts as the Data Fiduciary for the Personal Data processed under this Privacy Policy.

Throughout this document, "we", "us", "our", "ours" refer to Fleetx. The terms "client", "user", "you", "your" and "yourself" or similar terminology are used in reference to the individual user of this Website, referred to under the DPDPA as a "Data Principal".

1. Information We May Collect

Fleetx may collect (i) personally identifiable information such as name, telephone number, e-mail address, etc.; and (ii) other Personal Data. While you can browse some sections of our Website without registration, certain activities (such as placing an order) or accessing certain areas of the Website shall require you to register. We may also maintain a record of your product interest for the purposes set out in Section 3. Fleetx does not collect Personal Data about you from affiliates or other third parties except where you have given consent for that collection, or where it is a legitimate use permitted under the DPDPA.

Under the DPDPA, "Personal Data" means any data about an individual who is identifiable by or in relation to such data, whether directly or indirectly, in combination with other information available.

If you decide to purchase our products or avail our services, our third-party service providers may need to collect certain additional information, such as your credit or debit card number and expiration date, or bank routing and account number, as Personal Data.

Device Information. When you are connected to our services via custom applications ("apps"), we may collect device-specific information such as your device model, operating system, unique device identifiers, and mobile network information. We may associate your unique device identifier or phone number with information that you

may have used to register for certain services or purchase products. Server logs maintained by us or by our third-party service providers may contain information about the services you have used, and your device-specific information. We may also maintain digital communication logs that track information such as your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, and SMS routing information. We may use your device's IP address or MAC address to track device-event information such as crashes, system activity, hardware settings, browser type, browser language, and the date, time and referral URL of your request.

Mobile Application Permissions (Android). When the Fleetx app is installed on your phone, a list of permissions is requested for the app to function effectively; there is no option to selectively customize this list. Each permission below is requested only after obtaining your consent, may be withdrawn at any time through your device settings where technically feasible, and is used solely for the purpose described. The permissions Fleetx requires, and how the resulting data is used, are as follows:

- **Device & App History:** We access information about your device, such as OS name and version, mobile network, hardware model, unique device identifier and preferred language, to optimize your overall app experience and use OS-specific capabilities.
- **Location / Map:** Used to help you find the distance of your truck from a particular location; if you choose your own location as the starting point in the Search by Location feature, your location is auto-detected and auto-filled.
- **Background Location:** For the Fleetx Field Service Engineer app, collected in both foreground and background where the field service engineer has provided consent, and used to calculate duty-wise kilometres travelled and to schedule and assign duty. For the Fleetx Driver | EPOD app, collected only in app-based tracking mode (foreground and background) where the driver has provided consent, and used to provide real-time and historical vehicle location history, trip/client/SLA/route information, and to file EPOD or trip expenses.
- **Phone:** Used to let you place calls to saved driver contacts and customer support directly through the app.
- **Camera & Photo Library:** Used to let you fetch saved photos, and to click, review and upload photos or documents, for registering E-POD and driver documents.
- **Device ID & Call Information:** Used to detect your Android ID for unique user identification, and to use incoming call data to improve your experience when you receive a call from a driver for assistance.

Specialized Information. We may collect and store information (including Personal Data) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. Certain services may include a unique application number in connection with the installation of apps. This number and related information, including operating system type and app version number, may be sent to our service providers when you install, update or uninstall apps. We may also collect and process information about your actual location, with your consent where required by applicable law.

At other times, Fleetx may collect information that cannot be used to identify you. For example, we may aggregate non-personal information about you and other customers who visit our Website. Aggregated information will not contain any information that can be linked directly back to you.

2. How We Collect Information

Fleetx uses cookies and similar technologies only after obtaining consent where required by applicable law. Users may manage or withdraw cookie preferences at any time through the cookie preference centre or browser settings. "Cookies" are text files that we place on your computer or mobile device when you visit our Website, which we may use to personalize your interactions with our Website. If you do not accept or delete our cookies, our Website may take more time to work, or may not function properly.

Fleetx may also collect additional information from your web browser each time you visit our Website. We may collect information about the pages you visit and the time spent on each web page or area of the Website, the promotions or advertisements you click on, and other actions you take while using our Website. This information

may include your Internet Protocol ("IP") address, the type of browser, the time your browser was used to access our Website, and the referring website's address.

Our Internet service providers may also use other standard web-based technologies to analyze your movements while accessing our Website, including web "beacons", "pixel tags" and "clear gifs". These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our Website, and help determine the best use for our Website's content and offerings. Some of this information, including the IP address, may be stored on our Internet service provider's server logs and may be available for extended periods of time.

Fleetx may collect and process the following categories of Personal Data depending upon the services used: identity information, contact information, account credentials, payment information, vehicle and telematics data, location information, device information, communication records, and any other Personal Data voluntarily provided by the Data Principal.

3. Purpose of Processing

Fleetx processes Personal Data only for specified, lawful purposes, including:

- providing fleet management services;
- account creation and authentication;
- vehicle tracking and logistics operations;
- customer support;
- billing and payment processing;
- regulatory compliance;
- fraud prevention;
- service improvement and analytics; and
- any other purpose for which valid consent has been obtained or which is otherwise permitted under the DPDPA.

4. Legal Basis for Processing

Fleetx processes Personal Data:

- with the consent of the Data Principal; or
- for the legitimate uses permitted under Section 7 of the Digital Personal Data Protection Act, 2023, which in Fleetx's case are limited to: (i) Personal Data voluntarily provided by you for a specified purpose, in respect of which you have not indicated that you do not consent to its use; (ii) compliance with any law, judgment or order in force in India; (iii) responding to a medical emergency or a threat to the life or health of any person; (iv) taking measures during an epidemic, outbreak of disease, disaster or breakdown of public order; and (v) purposes related to employment, or to safeguard Fleetx from loss or liability, in respect of our employees.
- Where the requested Personal Data is necessary to provide our products or services, failure to provide such Personal Data may result in Fleetx being unable to provide or continue the requested services or certain features.

5. Consent Withdrawal and Choice

Fleetx allows you to choose whether your Personal Data is disclosed to a non-related third party for purposes other than Fleetx-related communications, business or services. You may withdraw your consent at any time, and the process for withdrawing consent shall be as easy as the process by which consent was given, by any of the following means: (i) the cookie preference centre, in respect of cookie-based consent; or (ii) writing to grievance@fleetx.ai. Withdrawal of consent shall not affect the lawfulness of processing carried out before such withdrawal. On

withdrawal, Fleetx and any Data Processor engaged by Fleetx shall cease processing the relevant Personal Data within a reasonable time and shall erase it, unless retention is required for compliance with any law in force in India. For Fleetx employees, consent (where required) is obtained through Fleetx's HR processes (such as Zimyo) or other appropriate mechanisms, and not through this Website or its consent settings, since Fleetx is not the Data Fiduciary in respect of its enterprise customers' end-user data.

You have the right to withdraw your consent to the use, disclosure or transfer of your Personal Data. Where the Personal Data concerned is necessary for Fleetx to provide a particular service or feature, withdrawal may mean that Fleetx can no longer provide that service or feature to you, and Fleetx will inform you of this before giving effect to the withdrawal. Fleetx will not withhold services or features that do not depend on the withdrawn Personal Data. You also have the right to obtain a summary of your Personal Data and of the processing activities undertaken by Fleetx, and to seek correction, completion, updating or erasure of your Personal Data. These rights may be exercised in the manner set out in Section 11.

The information contained on our Website is for general information purposes only. While we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the Website or the information, products, services or related graphics contained on our Website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage, including without limitation indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this Website. Through this Website you may be able to link to other websites which are not under the control of Fleetx. We have no control over the nature, content or availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorsement of the views expressed within them. Nothing in this Privacy Policy operates to limit or exclude Fleetx's obligations, or your rights and remedies, under the DPDPA or any other law in force in India.

6. Use and Disclosure of Your Personal Data

At times Fleetx may use the services of independent companies to provide certain services to you, including, without limitation, website hosting services, credit card processing, product promotions, order processing and shipping services, and visitor surveys. Fleetx shares Personal Data only with the following categories of recipients, and only to the extent necessary for the purposes set out in Section 3: (i) cloud hosting and infrastructure providers; (ii) payment processors; (iii) communication, messaging and customer support platforms; (iv) analytics providers; (v) professional advisers and auditors; and (vi) government or regulatory authorities where required by law. We do not share Personal Data with non-related third parties without your consent, except to the extent necessary to complete your request for products and services offered through our Website, or as otherwise permitted under the DPDPA.

Fleetx shall send marketing communications only where permitted under applicable law or where the Data Principal has provided the necessary consent. Such consent may be withdrawn at any time. We also use return e-mail addresses to answer e-mails we receive from you. Your e-mail address will not be shared with non-related third parties for use in their direct marketing programs, other than to comply with applicable law. We may also use your IP address or unique device identification numbers to help protect Fleetx and our Internet service providers from fraud.

Additional uses of your Personal Data allow us to tailor products and services to your needs, to help organize and manage our relationship with you or your business, to conduct business, to provide customer and guest support, to perform functions described to you at the time of collection, and to enforce our Website's Terms. We reserve the right to provide non-personal, aggregated information to third parties, and may use such information to improve our Website and to analyze the effectiveness of our business and advertising models.

Fleetx shares Personal Data only with authorised data processors and service providers under contractual obligations requiring appropriate security measures, and processing solely on Fleetx's documented instructions. Such processors may be located within or outside India, subject to Section 7 (International Transfers) below.

Fleetx may also disclose your Personal Data as necessary to: (a) comply with a subpoena or court order; (b) cooperate with law enforcement or other government agencies; (c) establish or exercise our legal rights; (d) protect

the property or safety of our company, employees, contractors, vendors, suppliers and customers; (e) defend against legal claims; (f) assist with internal and external investigations; or (g) as otherwise required or permitted by law. We may disclose your Personal Data in connection with the sale or merger of Fleetx, or any transaction involving the sale or assignment of some or all of our assets.

7. International Transfers

Personal Data may be transferred outside India only in accordance with Section 16 of the DPDPA and subject to any restrictions or conditions notified by the Central Government in respect of specified countries or territories. Where any other law in force in India provides a higher degree of protection for, or a restriction on, the transfer of a particular category of personal data outside India, including sectoral requirements applicable to payment data, that law shall prevail. Where Personal Data is processed outside India by a Data Processor on Fleetx's behalf, Fleetx remains accountable for that processing and requires the processor, by contract, to apply security safeguards equivalent to those described in Section 8.

Fleetx primarily stores customer data within infrastructure located in India. Where customers elect to use AI-enabled features, limited data necessary for providing those services may be processed by authorised AI service providers under appropriate contractual, confidentiality and security obligations.

8. Data Storage, Security and Retention

Fleetx implements reasonable security safeguards, including technical and organisational measures, to protect Personal Data from personal data breaches. Fleetx makes reasonable efforts to ensure that our Internet service providers have implemented physical, electronic and procedural security measures to help safeguard your Personal Data and protect against unauthorized access and disclosure. Your Personal Data collected by us is stored on our systems in India and/or outside the territory of India, by us or our subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors, subject to Section 7 above. Notwithstanding our efforts, the Internet has inherent security risks, and Fleetx cannot promise, and you should not expect, that your Personal Data, searches and other communications will always remain secure. You should take care with how you handle and disclose your Personal Data, and any username or password required to access services on our Website.

These safeguards include, at a minimum: encryption, obfuscation or masking of Personal Data, or the use of virtual tokens mapped to it; appropriate access control for the computer resources used by Fleetx and its Data Processors; logging, monitoring and periodic review of access, so that unauthorised access can be detected, investigated and remediated; system and application logs are generally retained for up to 180 (one hundred and eighty) days unless a longer retention period is required by law, contractual obligations or an ongoing security investigation; reasonable measures to ensure the continued processing of Personal Data in the event of a compromise, including data backups; and contractual obligations requiring Data Processors engaged by Fleetx to implement equivalent safeguards.

Personal Data shall be retained only for as long as necessary to fulfil the purpose for which it was collected, to comply with legal obligations, resolve disputes, or enforce contractual rights. Thereafter, the Personal Data shall be securely erased or anonymised, unless retention is required by applicable law.

In addition, Fleetx shall erase Personal Data, and shall require its Data Processors to erase it, as soon as reasonably practicable where you withdraw your consent or where the specified purpose for which the Personal Data was collected is no longer being served by its retention, unless retention is necessary for compliance with any law in force in India.

9. Personal Data Breach

On becoming aware of a Personal Data Breach, Fleetx shall intimate the Data Protection Board of India without delay, and shall furnish to the Board, within 72 hours of becoming aware of the breach (or such longer period as the Board may allow on request), the particulars prescribed under the DPDPA and the rules made thereunder, including the events and circumstances leading to the breach, the measures taken to mitigate risk, the findings regarding the person who caused the breach, and the remedial measures implemented to prevent recurrence. Fleetx shall also notify each affected Data Principal without delay, through their user account or the mode of communication registered with Fleetx, in clear and plain language, setting out: a description of the breach, including its nature,

extent and timing; the consequences relevant to that Data Principal that are likely to arise from it; the measures being implemented by Fleetx to mitigate risk; the safety measures that the Data Principal may take to protect their interests; and the business contact information of the person able to respond to queries about the breach.

10. Children and Data Collection

Fleetx does not undertake tracking, behavioural monitoring or targeted advertising directed towards children unless permitted under applicable law. Our Website and services are directed to be used by adults only. Fleetx does not process the Personal Data of a child, being any person below 18 years of age, without first obtaining verifiable consent from the parent or lawful guardian and does not process the Personal Data of a person with disability who has a lawful guardian without obtaining the consent of that guardian.

Before processing such Personal Data, Fleetx will exercise due diligence to verify that the individual giving consent is an identifiable adult, using reliable identity and age details already available with Fleetx, details voluntarily made available by that individual, or a virtual token mapped to such details and issued by an entity authorised by law or by the Central Government. Fleetx shall not undertake any tracking or behavioural monitoring of children, and shall not direct any targeted advertising at children, save to the extent expressly exempted under the DPDPA and the rules made thereunder. If Fleetx or its service providers become aware that a child's Personal Data has been processed without such consent, that Personal Data will be deleted from our systems. If you have questions about Personal Data that may have been submitted by a child, please email us at support@fleetx.ai.

11. Rights of the Data Principal

Subject to applicable law, every Data Principal may:

- obtain information regarding processing of their Personal Data;
- request correction, completion, updating or erasure of Personal Data;
- withdraw consent where processing is based on consent;
- nominate another person to exercise rights in accordance with the DPDPA;
- request a summary of the Personal Data being processed by Fleetx, subject to applicable law.
- seek grievance redressal; and
- approach the Data Protection Board of India where the grievance remains unresolved.

How to exercise these rights. A request may be made to grievance@fleetx.ai, or through the privacy section of your Fleetx account, stating the right you wish to exercise. To enable Fleetx to identify you, please quote the registered email address, mobile number or user ID under which your Personal Data is held with Fleetx; Fleetx will not require any other identifier unless it is necessary to verify your identity. Fleetx shall acknowledge each request within 3 (three) business days and shall respond to it within 30 (thirty) days of receipt, which is the period published by Fleetx for this purpose and is within the maximum period permitted under the DPDPA and the rules made thereunder.

Nomination. You may nominate one or more individuals to exercise your rights under the DPDPA in the event of your death or incapacity, by writing to grievance@fleetx.ai with the name and contact details of the nominee. A nomination may be varied or cancelled at any time by the same means.

Your duties. Section 15 of the DPDPA requires you to comply with applicable law when exercising your rights, not to impersonate another person, not to suppress material information or furnish false particulars, not to raise a false or frivolous grievance or complaint, and to furnish only verifiably authentic information when seeking correction or erasure of your Personal Data.

The first time you provide us with registration information through our Website, you may be offered the opportunity to subscribe to and receive additional information about our products and services. After your first use, you can change your preferences by contacting our customer service e-mail at support@fleetx.ai. Each commercial e-mail we send will offer you the opportunity to opt out of continuing to receive such messages. Fleetx shall give effect to opt-out and consent-withdrawal requests without undue delay and in any event within 7 (seven) business days.

Fleetx will make withdrawal of consent as easy as giving consent.

For any grievances related to the use of your Personal Data, you may also contact us at support@fleetx.ai.

12. Data Integrity

Fleetx will only process Personal Data in a way that is compatible with and relevant for the purpose for which it was collected or authorized by you.

13. Enforcement

Fleetx uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate and comprehensive for the information it is intended to cover, in line with our privacy principles. We encourage interested persons to raise any concerns using the contact information provided, and we will investigate and attempt to resolve any complaints or disputes regarding the use and disclosure of Personal Data in accordance with the DPDPA and applicable law.

14. Grievance Officer and General Contact

Fleetx may update this Privacy Policy from time to time, and you should review it each time you visit our Website. By using our Website or providing us with Personal Data after we update this Privacy Policy, you agree to this Privacy Policy as revised. Fleetx is committed to protecting your privacy. If you have questions or comments about our privacy practices, or require additional information, please contact our Grievance Officer:

Grievance Officer Details :

Name: Sanjeev Kumar Mehta

Email: grievance@fleetx.ai

Designation : VP - Finance & Legal

Address: 320, 3rd Floor, Tower A, Vatika Business Park, Sector 49, Gurugram, Haryana, 122018

The Grievance Officer is also the person authorised by Fleetx to answer, on its behalf, any questions from a Data Principal about the processing of their Personal Data. Grievances will be acknowledged within 3 (three) business days and resolved within 30 (thirty) days of receipt. If your grievance is not resolved within that period, or you are not satisfied with the response, you may make a complaint to the Data Protection Board of India.