

Privacy Policy – ORBCOMM Apps

This privacy policy describes the data that ORBCOMM Inc. and its subsidiaries including, but not limited to, ORBCOMM LLC, ORBCOMM Canada Inc., ORBCOMM Europe B.V./GmbH/Ltd., ORBCOMM Africa (Pty) Ltd., ORBCOMM Japan Ltd., ORBCOMM Technologies India (Pvt) Ltd. and Blue Tree Systems, Inc. (“ORBCOMM,” “we,” “us,” and/or “our”) collects through software applications for mobile phones and tablets made available to our customers (“Customers,” “you,” and/or “your”) on the Google Play and Apple App Stores (each an “app” or the “apps”). Any “personal information” (defined below) collected through an app is solely collected for and on behalf of our Customers. In connection with this collection of personal information, ORBCOMM is only a processor (as defined by applicable laws such as GDPR and CCPA/CPRA, along with their implementing regulations, as they may be amended from time to time “privacy laws”); each Customer, individually, is a controller of their personal information (as defined by applicable privacy laws). For a very limited subset of general technical data, ORBCOMM is a controller such as information related to app performance, including diagnostics, crash logs, device ID, etc (“app data”). For how the controller uses all non-app data collected by the app, please contact the relevant customer for details about their privacy practices. ORBCOMM is not responsible for the use, privacy or information security practices of our customers, which are different from those in this privacy policy.

COLLECTION AND USE OF PERSONAL DATA

“Personal Information” is any information that relates to an identified or identifiable individual. ORBCOMM collects a limited set of personal data on behalf of its customers through the use of the apps. What type of Personal Information collected through an app depends on which app(s) is being used by a particular customer and how that app is configured.

- We may collect Personal Information that you provide as part of the app registration process, whether set up directly by you or by a customer administrator for an ORBCOMM product that interfaces with the app. This Personal Information may include your name, email address, phone number, a user ID, password, and other personal data contained within in-app messages.

- In order to use all of the functions of an app, additional information may be input into the app. This information may be provided directly by you or your employer in connection with the app's interface with other ORBCOMM products as well as certain third party platforms on which ORBCOMM products operate. This information may include, but not be limited to, driver's license numbers, vehicle registration numbers, license plate numbers, and geolocation. Photos you take using the app or uploaded through or uploaded using the app may also be collected and may include generalized data as well as Personal Information depending on the content of the photograph(s).
- We automatically collect diagnostic information about your use of the app as well as information about the device the app is used. The information collected includes device identifiers, device type, device operating system, crash logs, diagnostics, and other app-performance related analytics data. We may also collect the inventory of installed apps on a given device if you are using our Dev Tools, Agent, or Launcher apps for the sole purpose of identifying and resolving any potential application conflicts that may result in an unfavorable user experience when using our offer. Many of our apps are designed to track geolocation which may constitute "sensitive personal information" under various privacy laws including the CPRA (Please see our California data privacy notice).
- We may use your Personal Information to monitor login attempts to identify possible fraudulent activity or to respond to regulatory agencies, law enforcement, subpoenas or other legal demands that ORBCOMM is required to comply.

ORBCOMM collects and uses this data and Personal Information for legitimate business purposes related to our contractual relationships and in accordance with our customers' directions, including: device installation & maintenance, asset (container) inspection and other reporting, route management, temperature control (where applicable) vehicle and trailer selection, log review and certification, dispatch communications. We also collect and use this data to authenticate app users.

ONWARD TRANSFERS AND DISCLOSURE OF PERSONAL INFORMATION

ORBCOMM does not sell your Personal Information. However, we do share your Personal Information with our Customers if they are your employer our subsidiaries and affiliates and contractors and other third parties (subprocessors) assisting us in complying with our legal obligations solely with the permission, authorization, and/or consent of our customers. Any subprocessor of your Personal Information will have agreed and be bound by contractual obligations to keep the data, including your Personal Information secure and confidential using it only in connection with supporting our products and services.

INFORMATION SECURITY

Preserving the security of your Personal Information is ORBCOMM's primary concern. We have instituted contractual, technical, and organizational strategies designed to prevent unauthorized access, use, and disclosure of Personal Information. These strategies are carefully designed, considering the latest technology, risks associated with processing, and the nature of the data. When your personal data is shared with third parties, including service providers, we apply certain conditions on them to secure the data and prohibit its use for any purpose other than providing the necessary services.

USE BY MINORS

ORBCOMM PRODUCTS AND SERVICES, INCLUDING THE APPS ARE NOT DIRECTED OR INTENDED TO BE USED BY MINORS UNDER THE AGE OF 18 ("MINORS"). ORBCOMM DOES NOT INTENTIONALLY COLLECT USE OR SELL THE PERSONAL DATA OF MINORS. IF YOU ARE UNDER THE AGE OF 18 DO NOT DOWNLOAD OR USE ANY ORBCOMM APP(S).

DATA PROTECTION RIGHTS, AND HOW TO EXERCISE

You have a right to know what Personal Information ORBCOMM has collected about you, as well as a right to access, correct and possibly have deleted this Personal Information retained by ORBCOMM, as a processor directed by our customer – your employer. You may also object to ORBCOMM's processing of your Personal Information and exercise your right to have your Personal Information transferred to another controller. As part of your right to withdraw the consent you may have given to the controller (your employer), where that consent is the basis

for ORBCOMM's processing at the direction of the controller (your employer) you must withdraw that consent directly with the controller (your employer) who will provide direction to ORBCOMM, as processor. If you are an independent contractor directly using an ORBCOMM app, your use of the app and any requests to ORBCOMM is your exercising of express consent as may be required under applicable data privacy laws. Note that there may be other legitimate reasons and a legal basis for a controller to direct ORBCOMM to process your Personal Information (despite your withdrawal of consent to any processing that took place prior to the withdrawal of your consent).

You should directly contact the controller who is our customer (your employer) to exercise your rights. You may also reach out to ORBCOMM at privacy@orbcomm.com. If you contact ORBCOMM directly, please specify the specific information you are concerned with and whom the ORBCOMM controller customer is (your employer) so ORBCOMM can confirm your inquiry with them so it is addressed properly.

UPDATES TO THIS PRIVACY POLICY

ORBCOMM may periodically make changes to this privacy policy in order to reflect changes in applicable privacy laws, as well as ORBCOMM's internal policies and practices, the app(s) and their functionality and other factors. When we make changes to this privacy policy, we will mark the latest version with the date of the revision at the end of the document. In addition, we may notify you directly through the app that changes have been made.

CONTACT US

If you have any questions regarding this privacy policy or our privacy practices, you may email us at privacy@orbcomm.com. If you would like to communicate with our Data Protection Officer, please email privacy@orbcomm.com. You can also contact us by writing to us at the following addresses:

ORBCOMM Inc. Attention: Legal & Compliance Department, Data Privacy Officer – 395 West Passaic Street, Ste 325 Rochelle Park, NJ 07662 USA