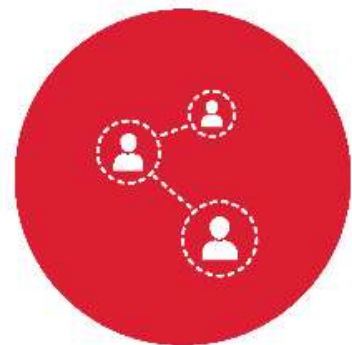
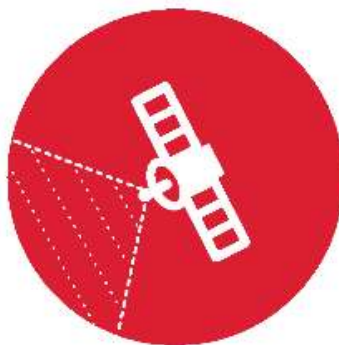




Privacy Policy

Policy





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History

Version	Date	Notes	Contributor
0.1	03.06.25	First 0.1 Draft	Andy Patrick – andy.p@argustracking.com
0.2	25.08.25	Reviewed legal comments from Argus Tracking Privacy Policy Word AP comments 14 July 2025(6927518.1) and included here	Andy Patrick – andy.p@argustracking.com
03	10.04.26	Updated to ensure for IPP3A compliance	Andy Patrick – andy.p@argustracking.com



1 Introduction

1.1 Overview

The latest version of these terms can always be found on the Argus Tracking website (ArgusTracking.com). The below, while correct at the time of printing, may have been superseded, therefore in all cases, the online version should be deemed as correct.

2 Argus Tracking General Privacy Policy

Personal information is information about an identifiable individual or by which a person's identity can be reasonably determined. Argus Tracking Holdings Limited (Argus, we, us, or) NZBN 9429031078085 whose registered office is located at Corporate Services Limited, Floor 5, 79 Queen Street, Auckland Central, Auckland, 1010, New Zealand recognises the importance of safeguarding your personal information and commercially sensitive information about your organisation. As a provider of commercial services we may need to obtain personal information about you, your staff, your volunteers and your contractors in the course of providing our products and services. The information we collect and how we use it differs depending on our relationship with you. We use any and all personal information legally, fairly and transparently as set out in this document.

This Privacy Policy will help you understand how we collect, use and protect your and your employees' personal information when you visit our websites, contact us, or use our products and services.

2.1 What Personal Information Does Argus Collect?

Whenever possible we collect this personal information directly from you. This might be during a phone call or meeting with you or we might collect information you provide to us through account or partnership registration, completing forms, contacting us online or by email. If you are:

- A supplier or potential supplier, we may collect personal information about your officers (such as directors), employees and subcontractors. This may include names, addresses (email, physical or postal), contact numbers and job titles. We may collect personal information that is related to specific work you or your employees are engaged to perform for us such as qualifications, experience and skills.
- A job applicant, if you apply to work with us, we will collect your name, address, contact numbers and information about your qualifications, experience and skills.

We may collect information about you from someone else if you are:

- An employee who interacts with us on behalf of a customer or supplier, we may collect information from your employer or a co-worker.
- A potential supplier or a job applicant, we may collect personal information about you from referees you have authorised us to speak to.
- or that we may have obtained from another source (such as marketing partners, referral partners or from marketing organisations) or if you are a potential supplier, from online reviews.

If you are a customer, we may collect personal information directly from you or indirectly from third parties (e.g. customers, partners, acquired businesses, or data providers):





- Names, your company's name, tax file number, Drivers License details, date of birth, address, telephone numbers, credit card, bank account, and/or financial details, information on how you use our products and services (such as your video views history, help conversations, and browsing activity when visiting one of our websites), references, opinions and/or lifestyle information and any other information collected in relation to your use of our products and services.

If you do not provide us with this information, we may not be able to:

- Provide customers with goods or services they require;
- Engage suppliers to provide goods or services to us, provide suppliers with access to our sites or pay you in a timely manner for goods and services supplied to us;
- Progress job applications.

2.2 Indirect Collection of Personal Information

We may collect personal information about you from third parties, rather than directly from you. This may include information provided by your employer, customers, business partners, service providers, publicly available sources, or as part of a business acquisition or due diligence process.

Where we collect your personal information in this way, we will take reasonable steps to notify you as soon as practicable. This notification will include:

- the personal information we have collected about you;
- the purpose for which the information was collected;
- how we intend to use the information;
- the types of organisations or persons we may disclose the information to (as described in section 2.7);
- our name and contact details;
- whether the collection is authorised or required by law (where applicable);
- your right to access and request correction of your personal information.

We may not notify you of the indirect collection of your personal information where an exception applies under applicable privacy laws, including where:

- you have already been made aware of the collection;
- the information is not used in an identifiable form;
- it is not reasonably practicable to provide notice;
- non-compliance is permitted or required for legal, regulatory, or law enforcement purposes.

2.3 Argus Tracking App

When you download and register to use our app, Argus Tracking, we collect your first and last name, email address, phone number, the name of your company and device details such as the make, model and operating system of your phone. In many cases, this information is provided to us by your employer or account holder rather than collected directly from you.

Other information we collect, use and disclose from Argus Tracking depends on the options you choose. If you have chosen:





Argus Tracking option	Type of information collected	Why we collect it and how we use it	Who we might disclose it to and why
[All options]	Real-time GPS location co-ordinates	Internal business purposes only to monitor and improve our products and to provide our service	Technology partners to allow determine the location of vehicles and make this information available to the customer
			Customer whose account is associated with that instance of the app to see the exact location of their fleet vehicles at any given time
Fleet Management & Pool Booking	Driver name and contact details, and vehicle information	Internal business purposes only to monitor and improve our products and to provide our service	External booking calendar provider to enable bookings direct from app
Driver behaviour and reporting	Speed, location, origination, destination, stop locations, general travel information	To provide our service	Customer whose account is associated with that instance of the app to see the exact location of their fleet vehicles at any given time

2.4 Argus Vision AI Dashcam

When you subscribe for our Vision AI Dashcam product, we collect real time video footage internally and externally of a vehicle which includes location information from the external camera and biometric information from the internal camera.

The Argus Vision external and internal cameras provides real-time video which may be viewed by the customer. The:

- external camera also detects external road risks such as forward collisions and pedestrian hazards (incidents).
- internal camera detects driver fatigue, phone use and distraction (incidents).

If an incident occurs Argus Vision will record footage from a limited period of seconds prior to an incident until a limited period of seconds following an incident. This footage may be downloaded by the customer.

We collect this information on behalf of our customers and do not use it for our own purposes.

The information collected by the internal camera is biometric information and as such is considered sensitive personal information under the Privacy Act. Customers must comply with all requirements related to the collection and use of biometric information including any obligation to notify their employees of such collection and use. If you are an employee of our customer, this collection and use will be subject to your employer’s privacy policy and your employment arrangements.





2.5 Website and Cookies

When you visit one of our websites, Argus may log how you got to the website, where you go within the website and any features you might use.

Our website uses "cookies". Cookies are an element of data that a website can send to your browser. We use cookies to provide you with tailored information from our website, to maintain our security requirements during your use of our website, to understand how visitors use the website and to improve it.

The information our cookies collect includes:

- Your server address;
- Your top level domain name (for example .com, .gov, .au, .uk, etc);
- Browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour such as the date and time of your visit to the site;
- The pages you accessed and the documents downloaded;
- The previous site you have visited;
- The type of browser you are using; and
- The type of device you are using.

We also use third party cookies and other technology to gather analytics and to advertise to you online. These allow vendors such as Google and Facebook to show ads from us to you on other websites and platforms. These activities use cookies to optimise and inform ads based on your visits to our website. Information collected may include your IP address, search terms you use, pages you access and links you click on, your operating system and browser type. You may opt out of these by following the instructions provided by these vendors on their websites.

If you use one of our websites to complete an online application form, or create an account, we will only collect the information you provide as part of that process if you complete and submit the application or register an account with us.

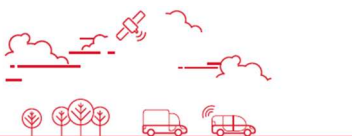
If you log out of our websites or cancel your application or account before submitting it, the information you had entered will be automatically deleted.

Our website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Site. We do not knowingly collect personal information from children under 13.

2.6 What Does Argus Do With My Information?

The information that we collect from you may be used by us for a number of purposes connected with our business such as:

- communicating with you;
- responding to your requests, enquiries or complaints and other customer care related activities;
- providing you with updates and information that may impact you or your use of our services;
- processing your application for registration for the purpose of becoming an Argus partner, or
- providing you use of or access to account holder/registered user information on our website;
- providing you with products and/or services you have requested or





- administering your account;
- if you are our supplier:
 - paying you;
 - carrying out market and product analysis; and
 - marketing our products and services;
- if you are a customer:
 - registering your details and allocating or offering you rewards, discounts or other benefits; and
 - fulfilling any requests or requirements you may have in respect of our partner programmes and other similar schemes;
- carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;
- carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and general administration; complying with our legal obligations to you;
- enforcing our rights and interests;
- if you apply for a position with us, to considering your suitability for that position;
- other specific purposes if you consent to them from time to time.

When we collect personal information directly through our products and services, such as directly from our Argus Tracking app, this collection is on behalf of our customer rather than for our own purposes. Where we collect your personal information indirectly, we will take reasonable steps to notify you of this collection as soon as practicable, including the purpose and intended use. It is the customer's responsibility to ensure that any employees, contractors or other users of our products and services are aware of the collection and the use and disclose of the information.

2.7 Will Argus Share My Information?

We will only disclose your personal information in a way that complies with the Privacy Act 2020 (Privacy Act) and is consistent with the purpose for which we collected it.

Your information may be shared with other members of the Argus Group in accordance with this privacy policy, including entities located in outside of New Zealand - for example, if your organisation has fleets in New Zealand and Australia (or elsewhere) and you have a requirement to provide rolled-up reporting to cover all your entities and vehicles. All Argus Group members handling your information are required to comply with the New Zealand Privacy Act 2020.

From time to time we may need to disclose your personal information to third parties. If we do this, we will only disclose your information to:

- those who provide products or services to us, or products or services that support the services that we provide, such as our business partners, and other suppliers to help us provide services to customers and to monitor our suppliers are meeting their obligations to us. This includes your chosen fuel provider and/or software provider partners, and Waka Kotahi NZ Transport Agency;
- anyone who assists us in protecting the operation of the Argus, and our networks and central solution systems, including the use of monitoring and detection in order to identify potential threats, such as hacking and virus dissemination and other security vulnerabilities;





- anyone who hosts or maintains data centres, service platforms and other infrastructure and systems on behalf of us, where your information is processed and or stored, which may be in a country other than New Zealand;
- a supplier who provides debt collection, credit reporting and/or payment systems services to us;
- persons to whom we may be required to pass your information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services; =
- any person or organisation as authorised by the Privacy Act;
- our professional advisors;
- if you have asked to receive marketing, advertising or other promotional information from us, our marketing and advertising suppliers;
- any person or entity you have requested or authorised us to disclose your personal information to;
- if you are a supplier performing services at our premises, to a third party, for example to another supplier operating as a Person Conducting a Business or Undertaking (as that term is defined in the Health and Safety at Work Act 2015);
- an external party, such as a government entity, a regulator or law enforcement agency, if required or authorised by law.

We will make sure that anyone included in the above list is contractually bound or will otherwise use best endeavours to ensure that recipients of the information will only use your personal information only for the purpose we shared it with them.

To find out how other organisations use your information from our website, please see their privacy policies.

Argus will not sell your information (or give it away for free) to third parties.

2.8 How Can I Access or Correct My Personal Information Held By Argus?

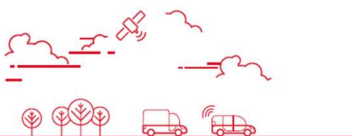
You have the right to know whether or not we hold any personal information about you. You also have the right to access your personal information, if we hold that personal information in a way that it can be readily retrieved. You may request access to the personal information we hold about you by sending an email to: support@ArgusTracking.com. We will fulfil your request by sending your copy electronically, unless the request specifies a different method.

You have a right to request a correction to personal information we hold about you. If we think the request is reasonable and we are reasonably able to make the change, we will correct the information. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

We may charge you our reasonable costs of providing you copies of your personal information or correcting that information.

2.9 How Does Argus Retain And/Or Store My Information?

We retain personal information that we collect (on both our active systems and our archive systems), for as long as is necessary under the law or for us to carry out the purposes for which the information was collected (including for the purpose of providing services to you). For registration and account information, this means that the information is likely to be retained for the period of time that we consider your account to be "active". An "inactive" account is where the account is not used for a continuous period of two (2) years. Once the information is no longer required, we dispose of it as recommended by the applicable authority such as the Privacy Commissioner.





The location at which we store your personal information will depend on the nature and purpose of the information and the manner in which you supply it to us. Argus will at its discretion use, process, and store your personal information at our premises and/or storage facilities whether in New Zealand or another country. You hereby consent to this transfer. You further agree that this agreement and any issues relating to privacy matters is governed by the laws of New Zealand and each party submits to the jurisdiction of the Courts of New Zealand and its privacy laws. In the event Argus decides to store the personal information outside of New Zealand, you still agree to be bound by the provisions of this clause.

2.10 Will Argus Protect My Personal Information?

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, use, modification or disclosure. We use a mix of onsite and cloud-based systems and storage to keep your information safe from unauthorised access, modification, disclosure, loss and misuse. Some of the protection measures we may use are:

- role-based restrictions for access to personal information that we store on our systems and in hard copy form;
- physical security controls for access to our storage area for paper documents and archives and on our onsite datacentre;
- password protection for access to information systems and specific information within the system;
- regular off-site backups;
- network segregation using modern application aware firewalls;
- anti-malware and spyware protection;
- logging and monitoring of traffic to and from our network and access to our cloud environment;
- engaging reputable, industry-leading cloud service providers; and
- imposing confidentiality requirements on our employees.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

2.11 Privacy Policy Supporting Documents

The privacy policy forms a part of our Terms of Service and should be read in conjunction with them. By creating an Argus account, or by viewing and using our websites or related services offered in conjunction with our websites, you agree to Argus collecting and using your personal information as set out in this Privacy Policy.

If you do not agree to any part of this Privacy Policy you can either contact us at support@ArgusTracking.com or you can stop accessing or using our websites and services.

We may in the future contact you to inform you of services and products available from Argus or our partners. If you do not wish to receive these offers you may opt out at any time. Please also note that while the Argus website hyperlinks to various other websites, Argus is not responsible for the privacy practice of those websites and/or the reliability of the information published on those websites.





2.12 Requests, Queries and Complaints

You may contact us at any time to:

- Request access to information that Argus has about you
- Correct any information that Argus has about you
- Delete any information that Argus has about you.

If you have any questions regarding this policy, our collection, storage of data or if you believe we have breached the Privacy Act 2020 you may contact our privacy officer either via:

email at support@ArgusTracking.com or

via phone on New Zealand: +64 9 951 0400

or via post at:

Corporate Services Limited
Floor 5, 79 Queen Street, Auckland Central
Auckland, 1010
New Zealand

If you are making a complaint, we may ask you to put the complaint in writing or to supply further details. We'll try to resolve your complaint within a reasonable time. If you aren't satisfied with how we've handled your complaint, you can lodge a complaint with the Privacy Commissioner at www.privacy.org.nz.

2.13 Changes To Our Privacy Policy

We may change this Privacy Policy from time to time at our discretion. Should we deem this amendment significant we will notify you through the contact details you have provided us. It is your responsibility to ensure the contact details we hold for you are valid and current at all times. This policy was last updated in April 2026.

