



**APPLIED TELEMETRICS INC. (dba 'PayBySky')**  
**Privacy Policy**

Effective Date: June, 2016

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This Privacy Policy is issued by Applied Telemetrics Inc. for its PayBySky business and service ("PayBySky"). It relates to information we collect for our location based services. PayBySky takes an individual's personal privacy very seriously and is committed to maintaining that privacy and trust.

**1. The PayBySky Technology**

PayBySky offers a cloud-based technology platform that performs location determination services with a focus on, but not limited to, payment services. The main source of information is from PayBySky's in-vehicle device called a "Skymeter". The PayBySky location technology determines the location of the Skymeter by interfacing with Global Navigation Satellite Systems (such as GPS) and by scanning for nearby Wi-Fi access points and cell towers visible to the Skymeter. In addition to this we also monitor and include data from the engine control unit of the vehicle and accelerometers and gyros. This information is then processed on the Skymeter and on PayBySky's servers to determine the location of the Skymeter. The location and movement of the vehicle are used to determine whether or not a financial transaction should be completed and whom it should be directed. Other services that are offered or may, in the future, be offered as part of the PayBySky service, such as real time asset tracking, trip log and invoicing, use various elements of the information that is collected.

**2. The Information the PayBySky Skymeter Collects**

When PayBySky's Skymeter collects and transmits data to its servers, we may collect location information that is provided or generated, including for example, location results, GPS coordinates, the MAC address of wireless routers (an alphanumeric code that is unique to that hardware device), the Received Signal Strength Indicator (a measurement of the strength of the access point's signal at the time it is received by the mobile device), the cell ID of nearby cell towers, information from the vehicle and on-board gyros and accelerometers. This location data is collected in a form that does not personally identify a user, but does identify a vehicle.

**3. How PayBySky Uses Information**

The PayBySky technology for location based services collects information that will be used:

- To provide location based service(s), such as autonomous financial transactions, real time asset tracking, event history, log book and invoicing transactions.



- To improve the quality, accuracy and precision of PayBySky's capabilities and develop and/or enhance PayBySky products and services.

PayBySky may use the information collected:

- To sell or provide anonymized and aggregated information to third parties, including transportation authorities and private data analysis firms;
- To aggregate data about device usage at a particular location or particular time;
- To de-identify or anonymize information for our business purposes;
- To carry out the transaction(s) requested or authorized by users.

#### **4. How PayBySky May Share Information**

Except as described in this privacy policy, PayBySky will not share any information that is collected by the PayBySky services with third parties.

In addition to the uses described above, PayBySky may share the information that we collect:

- With agents, vendors or service providers that help PayBySky to process the data or operate our business;
- As required by law, such as to comply with a subpoena, or similar legal process;
- When PayBySky believes in good faith that disclosure is necessary to protect our legal and contractual rights or the safety of others, investigate fraud, or respond to a government request;
- If PayBySky is involved in a merger, acquisition, or sale of all or a portion of our assets, in which case users will be notified via a prominent notice on our Web site of any change in ownership or uses of the information; or
- Where you have granted us permission.

#### **5. Opt Out Choices**

Location Information: For users, who do not want any location data to be stored, the application and the Skymeter provide controls for deleting all location information after each drive and, as applicable, the resulting financial transaction is completed. If this choice is made by the user, it will render all ability to audit any transaction impossible. The user therefore must accept full responsibility for any fees which are determined by the PayBySky service to be payable on the completion of a drive without recourse.

#### **6. Data Retention and Data Security**

Data on Skymeter: The Skymeter may store an encrypted local cache of information of all inputs until it has completed transmission to and confirmed data has been received by our servers. This cache of information will be deleted from the Skymeter the next time it connects to the PayBySky servers.



**Data Retention:** For all Skymeter identified data, unless the user opts out under the terms in Section 5 above, PayBySky may retain such data for up to six months. Beyond six months, any information that has been aggregated and anonymized for statistical purposes may be stored indefinitely. Other anonymous location data that is not associated with any unique identifier, device ID or any other personally identifiable information may be stored indefinitely and used for purposes of improving and maintaining our location service.

**Data Security:** PayBySky is committed to protecting the security of information that is collected by its technology. We follow generally accepted industry standards to protect the information gathered by our system(s), both during transmission and when stored on our systems. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of all information.

## **7. Cross Border Transfers**

The information we collect is stored and processed on servers located either in Canada or in the United States. We may transfer information that is collected to affiliated entities, or to other third parties, such as Skyhook, across borders and to other locations around the world. Use of the PayBySky technology and services constitutes consent to the transfer of the information described in this Privacy Policy to locations that may be outside of the country in which you live, and such places may be in the United States, within one or more European countries, and/or in one or more countries within Asia.

## **8. Changes and Updates to this Privacy Notice**

PayBySky may amend this Privacy Policy from time to time. When we do, we will also revise the "last updated" date at the beginning of the policy. We encourage you to review this policy periodically to stay informed about how we collect, use, and disclose data that we collect.

## **9. Website**

The PayBySky website has links to other websites. These websites are not governed by this privacy policy. Like most commercial websites, PayBySky may monitor site usage and related site information in order to ensure our site is providing optimal web service. Furthermore, we may provide this aggregated information to third parties. Such information would not include any identifiable personal information.

## **10. Contact Information**

If you have any questions or concerns regarding privacy using the PayBySky technology, please send a detailed message to: [privacy@PayBySky.com](mailto:privacy@PayBySky.com).