



# GDPR Statement

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# What is GDPR

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It also addresses the export of personal data outside the EU. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

An assessment of the key issues relating to 3Dtracking and the organisation's compliance to GDPR is provided in the sections below.

## 1 Who does GDPR apply to ?

GDPR relates to the protection of personal data of EU citizens. The purpose of the GDPR rules is to ensure that individuals know what data is being held, how that data is used, and to know that data has been deleted when it is no longer appropriate to be held.

## 2 How is 3Dtracking affected by GDPR ?

GDPR breaks data-handling entities into 2 types, namely controllers and processors. A controller is the entity that decides the purpose and manner that personal data is used or will be used. A processor is the entity that processes the data on behalf of the controller, and processing activities include the obtaining, recording, adapting or holding of personal data. 3Dtracking, as a SaaS company, is considered a processor under GDPR.

## 3 What personal data does 3Dtracking hold ?

The individuals within the 3Dtracking system that are affected by GDPR are what are referred to (on the 3Dtracking platform) as users and drivers. All user/driver data within the 3Dtracking platform originated either from the end-client and/or partner, who are the data controllers under GDPR. This data represents the full extent of personal information that the system contains, with the notable exception of the actual telematics data itself.

## 4 Why was personal data gathered in the first place and what is its purpose ?

This data was collected to allow the end-client to properly utilise the 3Dtracking platform, the ultimate aim of which is to enhance their business by increasing productivity and efficiency.



## 5 Upon what legal basis is 3Dtracking justified to hold personal data (Consent or Legal Requirement) ?

As the vast majority of end-clients are not using tracking due to legal requirements, the legal basis for gathering the data should be under the consent of the users/drivers. For this reason, it is vital that end-client companies ensure that they obtain specific consent from all users and drivers to capture their data into the 3Dtracking platform, and in the case of drivers, consent to track their telematics data. Failure to do this could result in the end-client being unable to utilise any telematics data in a disciplinary action against the driver.

## 6 Who has access to stored personal data ?

The only organisations that have visibility to any user/driver data, including the telematics data, are the users of the end-client, the users of the partner who manages the end-client, and potentially support staff inside 3Dtracking. Data is never shared with 3rd party organisations so there is no visibility of any 3Dtracking data outside of the above-mentioned groups.

## 7 How is 3Dtracking protecting personal data from breaches ?

3Dtracking has extensive security protocols and procedures in place to prevent unauthorised access to any and all data held within the 3Dtracking platform.

## 8 What else is personal data being used for ?

3Dtracking does not use the data for any other purposes other than to support the features and functions that end-clients are able to access via the the 3Dtracking platform. Data is never shared with 3rd parties, and 3Dtracking does not engage in any type of profiling activities.

## 9 When is personal data deleted ?

When any item within the 3Dtracking platform is deleted, that data is permanently deleted. This applies to items deleted by end-client users/drivers (such as a POI, etc) and items deleted by a partner user (such as user, unit or company).

## 10 In the event of a Subject Access Request (SAR), can 3Dtracking provide all personal data ?

Yes, 3Dtracking is able to respond to a Subject Access Request (SAR), providing a list of all personal data held. This is provided in a commonly used format, and will be completed within the prescribed 30 days.

