

# Table of Contents

- 1. Introduction.....2
  - About VTRACK.....2
  - Commitment to Privacy.....2
  - Scope of the Policy.....3
  - Legal Framework.....3
  - Contact .....3
- 2. Data Collection .....3
  - Information Collected Through VTRACK Solutions:.....3
    - Personal Information:.....3
    - Vehicle Information:.....3
    - Operational Data:.....4
    - Information Collected Through Our Website: .....4
  - Legal Basis for Data Collection:.....4
  - Means and Methods of Data Collection:.....4
  - Purpose of Data Collection: .....4
  - User Consent and Opt-out Options:.....4
- 3. Data Usage .....5
  - Enhancing Our Services:.....5
  - Supporting Our Customers: .....5
  - Operational Efficiency:.....5
  - Legal and Regulatory Compliance:.....5
- 4. Data Sharing and Disclosure.....5
  - Third-Party Sharing: .....5
  - Legal Compliance and Law Enforcement:.....6
  - Controlled Access:.....6
  - Notification and Consent:.....6
- 5. Data Retention and Protection .....6
  - Retention Policy:.....6
  - Protection Measures:.....6
- 6. User Rights and Choices .....7
  - Access and Correction:.....7

Data Portability:.....	7
Objection and Restriction of Processing:.....	7
Withdrawal of Consent:.....	7
Mechanisms to Exercise User Rights:.....	8
Responsiveness:.....	8
Educational Resources:.....	8
7. Cookie Policy .....	8
Usage of Cookies:.....	8
Management of Cookies:.....	9
Third-Party Cookies:.....	9
Consent:.....	9
8. Consent.....	9
Obtaining Consent: .....	9
Withdrawal of Consent:.....	9
Record-Keeping:.....	10
9. Contact Information .....	10
Reaching Out: .....	10
Dedicated Privacy Contact: .....	10
10. Updates to the Privacy Policy .....	10
Notification of Changes: .....	10
Review and Approval:.....	11

## 1. Introduction

### About VTRACK

VTRACK is a trailblazer in delivering state-of-the-art fleet management solutions within the Philippines. Our array of offerings, including GPS Devices, Preventive Maintenance Management Systems, and cutting-edge sensor technologies, are designed to empower every fleet, every journey, everywhere.

Our mission is to foster operational excellence, safety, and sustainability, thus establishing a culture of growth and advancement in the logistics and transportation sector.

### Commitment to Privacy

At the heart of VTRACK's ethos is a profound respect for privacy, which we recognize as the cornerstone of trust and enduring customer relationships. Our unwavering commitment to privacy is not merely a

legal obligation, but a reflection of our dedication to uphold the highest standards of integrity and transparency.

This Privacy Policy serves as a testament to our pledge in ensuring the responsible management of user data, in strict adherence to Google's guidelines and the Data Privacy Act of the Philippines. It provides a clear outline of how we collect, use, manage, and protect the personal data entrusted to us, demonstrating our resolve in maintaining a secure and trustworthy environment for our users.

### Scope of the Policy

This Privacy Policy applies to all the interactions you may have with VTRACK, be it through our innovative solutions, website, customer support channels, or any other services we provide. The policy encompasses the various types of data collected through our solutions including GPS Devices, Preventive Maintenance Management Systems, Fuel and Temperature Sensors, Two-Way Communication Tools, Driver RFID, Cameras, and Speed Buzzers. It also extends to any interaction you may have with us online or offline, thereby ensuring a comprehensive protection umbrella for your data.

### Legal Framework

We are committed to aligning our data privacy practices with the legal framework provided by the Data Privacy Act of the Philippines, and any other relevant laws and regulations. This commitment underscores our proactive approach in staying abreast with the evolving legal landscape surrounding data privacy, thereby ensuring that our practices are always compliant and reflective of the highest standards of integrity and transparency.

### Contact

Should you have any concerns or inquiries regarding our privacy practices, we encourage open communication and welcome you to contact us at the details provided in the 'Contact Information' section of this policy. Your trust is of paramount importance to us, and we are committed to addressing any concerns to maintain a transparent and trustful relationship.

## 2. Data Collection

Understanding the nature and scope of the data we collect is essential in fostering a transparent relationship with our users. We collect data through various channels, primarily through our innovative fleet management solutions and our website. Here's a detailed outline of the information collected:

### Information Collected Through VTRACK Solutions:

#### Personal Information:

1. **Driver Identification:** Through our Driver RFID system, we collect names, contact information, and driver identification details.
2. **Visual Data:** Onboard cameras capture visual data to ensure safety and monitor fleet operations.

#### Vehicle Information:

1. **Performance and Condition:** Data related to vehicle performance, location, and conditions are collected through GPS devices, Fuel and Temperature Sensors, and Preventive Maintenance Management Systems.

#### Operational Data:

1. **Driving Patterns:** Information related to driving patterns, speed, and communication is collected to optimize operational efficiency and safety, through Two-Way Communication tools and Speed Buzzers.

#### Information Collected Through Our Website:

1. **General Browsing Data (Digital Footprint):** Data such as IP addresses, device types, and browser types are collected to enhance user experience and ensure website functionality.
2. **User Interactions (Engagement Data):** Information regarding how users interact with our website and services helps us to improve our online offerings and understand user preferences.

#### Legal Basis for Data Collection:

We adhere to the legal frameworks provided by the Data Privacy Act of the Philippines in all our data collection practices. The collection of personal data is carried out with clear, explicit, and lawful purposes, ensuring that we uphold the principles of transparency, legitimate purpose, and proportionality as mandated by law.

#### Means and Methods of Data Collection:

Our data collection is rooted in innovative yet responsible practices. The methods employed for data collection are as follows:

1. **Automated Data Collection:** Our fleet management solutions autonomously collect data as they operate, minimizing the need for manual input while maximizing accuracy and efficiency. This includes real-time data collected from GPS devices, sensors, and other onboard systems.
2. **Voluntary Submission:** Personal data may also be collected when voluntarily submitted by the users, for instance, during account creation, customer support interactions, or through feedback forms on our website.
3. **Third-Party Sources:** We may also obtain data from reliable third-party sources in accordance with legal provisions, which helps in enhancing our service offerings and understanding user preferences better.
4. **Cookies and Similar Technologies:** Our website utilizes cookies and similar technologies to collect browsing data and user interactions, ensuring a personalized and efficient online experience.

#### Purpose of Data Collection:

The core purpose of data collection is to provide and continually enhance our innovative fleet management solutions, ensuring that we deliver on our promise of empowering every fleet, every journey, everywhere. Additionally, data collection helps in:

1. Offering personalized user experiences.
2. Responding to inquiries and support requests promptly.
3. Identifying areas of improvement.
4. Ensuring compliance with legal and regulatory requirements.

#### User Consent and Opt-out Options:

We uphold the principle of consent as outlined in the Data Privacy Act of the Philippines. Users are provided with clear options to give or withdraw consent regarding data collection practices. Details regarding consent and opt-out options are further elaborated in the 'Consent' section of this policy.

### 3. Data Usage

The utilization of collected data is a testament to VTRACK's commitment to innovation, customer-centricity, and operational excellence. Here's how we leverage data to provide an empowered, efficient, and excellent fleet management experience:

#### Enhancing Our Services:

1. **Continuous Innovation:** Utilizing data as a catalyst, VTRACK tirelessly innovates to elevate the quality of fleet management solutions provided. This entails refining our existing offerings, conceptualizing and developing new features, and ensuring a steadfast performance that seamlessly aligns with our clients' operational aspirations.
2. **Performance Monitoring and Improvement:** Data aids in monitoring the performance of our solutions in real-time, enabling us to identify areas of improvement, ensuring our services resonate with the highest standards of excellence and efficiency.

#### Supporting Our Customers:

1. **Personalized Support:** Data is instrumental in offering personalized support, ensuring that our responses to inquiries are accurate, timely, and tailored to meet the unique needs of each client.
2. **User Experience Enhancement:** By analyzing user interactions and feedback, we continuously strive to enhance the user experience, making our solutions more intuitive and user-friendly.

#### Operational Efficiency:

1. **Optimization:** Insights derived from the collected data are pivotal in optimizing our operations, driving sustainable practices that echo our unwavering commitment to excellence and efficiency.
2. **Resource Management:** Data helps in efficient resource allocation and management, ensuring that our operations are streamlined and cost-effective, which in turn, benefits our clients by providing superior services at competitive prices.

#### Legal and Regulatory Compliance:

1. **Compliance Monitoring:** We utilize data to ensure that our operations and services are in compliance with the legal and regulatory frameworks, including the Data Privacy Act of the Philippines.

### 4. Data Sharing and Disclosure

The dissemination of collected data is managed with a high degree of responsibility, ensuring legal compliance and preservation of user trust. Here's how data sharing and disclosure may occur:

#### Third-Party Sharing:

1. **Service Enhancement:** Data may be shared with trusted third-party service providers under strict confidentiality agreements to augment the quality and range of our services. For instance, maintenance providers for our Preventive Maintenance Management Systems may receive relevant data to ensure timely and effective service delivery.
2. **Legal and Regulatory Compliance:** Sharing with third parties may also occur to comply with legal, regulatory, or audit requirements, always under strict confidentiality and compliance protocols.

3. **Data Processing:** Certain third-party entities may be engaged to process data on our behalf, under stringent data protection agreements ensuring the safeguarding of your data.

#### Legal Compliance and Law Enforcement:

1. **Legal Obligations:** We may disclose personal data when required by law or in response to legal processes, ensuring adherence to the legal framework.
2. **Protection of Rights:** Data disclosure may occur to protect the rights, property, or safety of VTRACK, our users, or the public as required or permitted by law.
3. **Law Enforcement Cooperation:** In certain scenarios, we may be required to share data with law enforcement agencies, always in accordance with legal provisions and with a commitment to user privacy.

#### Controlled Access:

1. **Restricted Disclosure:** Access to personal data is restricted to authorized personnel only, and stringent measures are in place to prevent unauthorized disclosure.

#### Notification and Consent:

1. **Informed Sharing:** Where applicable, users will be informed about the sharing of their data and consent will be obtained, in alignment with the Data Privacy Act of the Philippines and other applicable laws.

## 5. Data Retention and Protection

Preserving the integrity and confidentiality of your data is a paramount concern at VTRACK. Here's how we manage data retention and ensure the protection of your data:

#### Retention Policy:

1. **Defined Retention Periods:** Data is retained for a period necessary to fulfill the purposes outlined in this policy, or as required by contractual agreements, unless a longer retention period is mandated by law. This aligns with our commitment to ensuring data minimization and purpose limitation as stipulated by the Data Privacy Act of the Philippines.
2. **Legal Compliance:** In certain cases, legal and regulatory requirements may dictate the retention period of specific data sets.
3. **Retention Review:** Periodic reviews are conducted to ensure that the data retained is still necessary for the intended purposes and compliant with evolving legal frameworks.

#### Protection Measures:

1. **Technical Safeguards:** Employing a blend of cutting-edge technologies, VTRACK safeguards your data through encryption, firewalls, and secure server infrastructure to thwart unauthorized access and ensure the integrity and confidentiality of user data.
2. **Organizational Safeguards:** Our organizational measures include stringent access controls, training and awareness programs for our personnel, and a culture of privacy and security.

3. **Third-Party Safeguards:** Vetting processes are in place to ensure that any third-party service providers adhere to stringent data protection standards, mirroring our commitment to data security.
4. **Incident Response Plan:** In the unlikely event of a data breach, VTRACK has a robust incident response plan to address and mitigate the impact, and to notify the concerned parties and regulatory bodies as required by law.
5. **Continuous Improvement:** We continually assess and enhance our security measures in response to the evolving threat landscape, ensuring that our data protection strategies are robust and up-to-date.

## 6. User Rights and Choices

VTRACK acknowledges and respects the rights of users concerning their personal data. We are committed to providing mechanisms that enable users to exercise their rights under the Data Privacy Act of the Philippines and other applicable laws. Here's a detailed outline of user rights and the provisions made by VTRACK to ensure these rights are accessible:

### Access and Correction:

1. **Data Access:** Users have the right to access their personal data held by VTRACK. We provide user-friendly mechanisms to request and obtain personal data, in a format that's easily understandable.
2. **Data Correction:** Users also have the right to correct inaccuracies or incompleteness in their personal data. We provide easy-to-use interfaces for updating user information to ensure its accuracy and completeness.
3. **Data Deletion:** In accordance with legal provisions, users have the right to request the deletion of their personal data when it's no longer necessary for the purposes for which it was collected.

### Data Portability:

1. **Portability Request:** Users have the right to request a copy of their personal data in a structured, commonly used, and machine-readable format for the purpose of transferring it to another service provider, as per legal provisions.

### Objection and Restriction of Processing:

1. **Processing Objection:** Users have the right to object to the processing of their personal data under certain circumstances as stipulated by law.
2. **Processing Restriction:** Users may also request the restriction of processing of their personal data, whereby the data will only be stored and not further processed as per the user's request, unless legal obligations dictate otherwise.

### Withdrawal of Consent:

1. **Consent Revocation:** Users have the right to withdraw consent for data processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal. Details regarding consent withdrawal are further elaborated in the 'Consent' section of this policy.

### Mechanisms to Exercise User Rights:

1. **User Account Interface:** Users can exercise their rights to access, correct, or delete their personal data through a user-friendly interface on their VTRACK account. This self-service portal is designed to provide easy navigation for users to manage their data.
2. **Customer Support:** Users can also reach out to our dedicated customer support team for assistance in exercising their rights. Our team is trained to provide the necessary support ensuring that user requests are handled promptly and efficiently.
3. **Online Request Forms:** For rights such as data portability, objection, and restriction of processing, users can utilize online request forms available on our website. These forms are designed to guide users through the process, making it straightforward to submit requests.
4. **Email Communication:** Users may also communicate their requests via email to our designated privacy contact, the details of which are provided in the 'Contact Information' section of this policy.

### Responsiveness:

1. **Timely Response:** VTRACK is committed to responding to user requests concerning their rights within a reasonable timeframe as stipulated by the Data Privacy Act of the Philippines.
2. **Transparent Process:** We ensure a transparent process where users are kept informed about the status of their requests and any actions taken.

### Educational Resources:

1. **Awareness and Education:** VTRACK is dedicated to educating users about their rights and how to exercise them. We provide resources and materials to ensure our users are well-informed and comfortable in managing their personal data.

## 7. Cookie Policy

VTRACK values the seamless and personalized user experience that cookies facilitate. Here's a detailed outline of our cookie policy:

### Usage of Cookies:

1. **User Experience Enhancement:** Cookies are employed to enhance the user experience on our website and within our solutions. They facilitate smoother interactions, personalized engagements, and help us understand user preferences to better tailor our offerings.
2. **Performance Monitoring:** Cookies aid in monitoring the performance of our website and solutions, helping identify areas for improvement to ensure optimal functionality.
3. **Security:** Cookies play a role in security by helping to protect user data and detect malicious activity.
4. **Marketing and Analytics:** With the aid of cookies, we can analyze the effectiveness of our marketing campaigns and gather analytics to continuously improve our outreach and service offerings.



### Management of Cookies:

1. **User Control:** Users have the choice to manage cookies through their browser settings. This includes the ability to accept, decline, or remove cookies, as well as to be informed when a cookie is being set.
2. **Guidance:** We provide guidance on how users can manage cookies and, where applicable, links to where users can learn more about controlling cookie settings in various browsers.
3. **Impact:** Users should be aware that modifying or declining cookies may affect the functionality and user experience on our website and within our solutions.

### Third-Party Cookies:

1. **External Services:** Our website and solutions may incorporate third-party services that set their own cookies. Users are encouraged to review the privacy policies of these third parties to understand how their cookies operate.

### Consent:

1. **Informed Consent:** By using our website and solutions, users consent to the use of cookies as outlined in this policy. Detailed information regarding consent and its withdrawal is provided in the 'Consent' section of this policy.

## 8. Consent

Consent stands as a pillar in our data handling practices, reflecting our dedication to empowering users and adhering to legal standards. Here's how consent is managed within VTRACK:

### Obtaining Consent:

1. **Clear Communication:** Consent is obtained through clear and straightforward communication, ensuring that users are well-informed about the data being collected, the purposes of collection, and how the data will be used.
2. **Explicit Consent:** We adhere to the principle of explicit consent, ensuring that consent is unequivocal and freely given. Users are provided with easy-to-understand options to grant or withhold consent.
3. **Informed Decision:** Users are provided with all necessary information to make an informed decision regarding consent. This includes information on data usage, sharing, and protection measures in place.

### Withdrawal of Consent:

1. **Easy Withdrawal:** Users have the right to withdraw consent at any time. VTRACK provides easy-to-follow procedures for withdrawing consent, reinforcing our commitment to empower users in managing their data.
2. **Effective Communication:** Upon withdrawal of consent, users are informed about the implications of such withdrawal, ensuring clarity and transparency.

3. **Timely Processing:** Requests for withdrawal of consent are processed in a timely manner, in adherence to legal requirements.

#### Record-Keeping:

1. **Documentation:** Consent interactions, including granting, withholding, or withdrawing of consent, are well-documented to ensure compliance with legal requirements and to provide a clear audit trail.

## 9. Contact Information

Your thoughts, inquiries, and concerns regarding data privacy are of paramount importance to VTRACK. We encourage open communication and are here to address any questions or concerns you may have regarding this privacy policy. Here's how you can reach out to us:

#### Reaching Out:

1. **Email Communication:** For a direct and swift response, feel free to email us at: [info@vtrack.ph](mailto:info@vtrack.ph). We are committed to addressing your inquiries in a timely and professional manner.
2. **Phone Support:** If you prefer a more personal interaction, we are available at +63 (998) 9837427. Our knowledgeable and friendly support team is here to assist you.
3. **Office Visit:** For face-to-face communication, you are welcome to visit us at our office located at 3/B 738 Marsk Building, Balete Dr, New Manila, Quezon City, Metro Manila. We value the opportunity to engage with you in person.

#### Dedicated Privacy Contact:

- **Privacy Officer:** For specific concerns regarding data privacy, you may reach out to our designated Privacy Officer who ensures our compliance with privacy laws and is here to address your concerns.

## 10. Updates to the Privacy Policy

VTRACK is committed to maintaining a privacy policy that is current and compliant with legal requirements. Here's how we manage updates to this policy:

#### Notification of Changes:

1. **Timely Communication:** Any amendments to this privacy policy will be communicated promptly to our users. This ensures transparency and allows users to stay informed about how their data is managed.
2. **Accessible Information:** Updates will be shared through our website or other suitable channels, making it easy for users to access and review the changes.
3. **Effective Date:** Each update will have an effective date, and users will be notified in advance to review the changes before they take effect.

### Review and Approval:

1. **Continuous Review:** This privacy policy is subject to continuous review to ensure compliance with evolving legal and regulatory frameworks, as well as alignment with best practices in data privacy and protection.
2. **Legal Oversight:** Updates to the policy are reviewed and approved by legal experts to ensure robust compliance with the Data Privacy Act of the Philippines and other relevant laws.