



Safe Fleet PTLW and FEI Divisions Privacy Policy

Last modified: December 9, 2020

Introduction

This is the privacy policy (this “**Policy**”) of the Passenger Transportation, Law Enforcement & Waste Division (“**PTLW**”) and the Fire, EMS & Industrial Division (“**FEI**”; PTLW and FEI, collectively, the “**Company**” or “**we**” or “**us**”) of Safe Fleet Acquisition Corp. (“**SFAC**”), which divisions include (but are not limited to) the operations of SFAC’s subsidiaries Specialty Manufacturing, Inc., FleetMind Seon Solutions Inc., Seon System Sales Inc., Seon Design (USA) Corp., COBAN Technologies, Inc., SF Mobile-Vision, Inc., Elkhart Brass Manufacturing Company, LLC and Fire Research Corp. (also d/b/a FoamPro), as well as SFAC’s MobileView business unit (also d/b/a Safe Fleet Transit Bus & Rail) and ROM Emergency business unit.

We are committed to protecting the privacy of the information you share with us, online and offline, when you inquire or otherwise communicate with or interact with us about, order, purchase, access, register for, participate in, and/or use (any of the foregoing, “**Use**”) our websites, applications, products, services and/or other offerings (collectively, “**Products & Services**”). This Policy describes the types of information that we may collect from you or you may provide us when you Use our Products & Services and our practices for collecting, using, maintaining, protecting, and disclosing (collectively, “**Managing**”) that information. This Policy does not apply to any information collected by any third party (including our affiliates and subsidiaries which are not a part of PTLW or FEI), including through any such third party’s website or other application, advertising, or other content that may link to or be accessible from or on any of the Products & Services.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By Using our Products & Services, you agree to this Policy and our Managing of Your Information as defined and described below. In some cases, we may also independently ask you to confirm your knowledge of the terms of this Policy; however, we are not obligated to do so. This Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued Use of our Products & Services after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates. In addition, this Policy may be supplemented by additional privacy terms or notices disclosed to you in connection with your Use of specific Products & Services.

Children’s Personal Information

Our Products & Services are directed at business professionals and vocational workers in the industries we serve; they are not intended for children under 16 years of age. We do not knowingly collect personal information (as defined below) from users in this age group and reserve the right to delete such information if we become aware of having collected or received it without verification of parental/guardian consent.

Information We Collect About You and How We Collect It

In the course of your Use of our Products & Services, we collect or receive from you information (“**Your Information**”): (i) by which you may be personally identified (including, for example, name, postal address, e-mail address, telephone number or any other identifier by which you may be contacted online or offline) (“**personal information**”), (ii) that is about you but by itself does not specifically identify you individually (including, for example, the company or business that employs you and your professional title), and/or (iii) that is about your Internet connection, the equipment you use to access our Products & Services, and related transactional and usage details.



We may collect Your Information directly from you when you provide it to us or automatically as you navigate through one of our websites, mobile applications, or other digital or electronic offerings (collectively, “**Information Platforms**”). Information collected automatically may include usage details, Internet Protocol (IP) addresses, and information collected through cookies, web beacons, and/or other tracking technologies.

In order to offer you a more consistent and personalized experience in your interactions with us, Your Information collected or received in connection with one of our Products & Services may be combined with Your Information collected or received in connection with our other Products & Services.

We also may receive information about you from external sources that are not affiliated with us (such as public information or information you provided to others with authorizations to share it with third parties) and add that to Your Information separately provided to us via your Use of our Products & Services.

Information You Provide to Us

Your Information may include:

- Information that you provide by filling in forms on our Information Platforms when registering for, subscribing to, or otherwise requesting or Using Products & Services, entering into a contest or promotion sponsored by us, or reporting an issue with any of our Information Platforms.
- Records and copies of your correspondence (including contact information), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions and activities you carry out through our Information Platforms and of the fulfillment of your orders for Products & Services.
- Information that you provide when posting comments, feedback or other content on any of our Information Platforms, where applicable.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Information Platforms, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including, for example:

- Details of your visits to and interactions with our Information Platforms, including traffic and location data, activity logs, and other communication and access data.
- Information about your computer and Internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways via our Information Platforms or otherwise through our offerings of Products & Services to you, such as our registration of participants in webinars or podcasts that we host or sponsor or our collection of attendee information at trade shows. These activities help us to improve our Information Platforms and Products & Services offerings and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Information Platforms and Products & Services according to your individual interests.



- Speed up your searches.
- Recognize you when you return to our Information Platforms.
- Offer you new or other Products & Services that may be of interest to you.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Information Platforms. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the applicable Information Platform.
- **Flash Cookies.** Certain features of some of our Information Platforms may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on that Information Platform. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).
- **Web Beacons.** Portions of our Information Platforms and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

From time to time, we may sponsor webinars, podcasts or other offerings that are hosted by third parties (“**Third-Party Offerings**”) who serve the related content or applications, including advertisements, to the participants in those Third-Party Offerings. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you participate in or otherwise Use these Third-Party Offerings. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

How We Use Your Information

We use Your Information, including any personal information:

- To create, maintain, customize, and secure your account with us.
- To provide you with Products & Services, access to and interaction with our Information Platforms, and information, content, and business opportunities that you have requested from us or that we think may be of interest to you. You may be required to provide identifying government registration numbers and/or financial information before placing an order, which we may use to complete credit approvals and/or comply with record-keeping requirements in connection with your orders.
- To process your requests, purchases, transactions, and payments, and to fulfill any other purpose for which you provide the information.



- To help maintain the safety, security, and integrity of our Information Platforms, Products & Services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Information Platforms and Products & Services.
- To notify you about changes to our Products & Services or our Information Platforms and/or ask for your input to help our research about them.
- To send you account-related notices or respond to your requests, inquiries, comments, or concerns.
- To fulfill our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To comply with applicable laws, rules, regulations, court orders or other legal, governmental or administrative process (collectively, “**Legal Requirements**”), including to respond to any government, regulatory or other law enforcement request, or to defend against legal claims.
- In any other way that we may disclose when you provide us with the information.
- For any other purpose with your consent.

If you do not want (or no longer want) us to use Your Information to contact you about Products & Services that may be of interest to you, you may use one of the opt-out methods described below under [Choices About How We Use and Disclose Your Information](#).

Disclosure of Your Information

We may disclose aggregated information about our customers and other users, and information that does not identify any individual, without restriction.

We may disclose Your Information (including personal information which, as described in this Policy, we collect or you provide to us):

- To our subsidiaries and other affiliates.
- To contractors, service providers, and other third parties we use to provide Products & Services and support our business.
- To comply with Legal Requirements, including to respond to any government, regulatory or other law enforcement request, or to defend against legal claims.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding.
- To enforce our legal rights between us and you, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us or our affiliates, our customers, or others. (This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.)
- To fulfill the purpose for which you provide the information.
- For any other purpose disclosed by us when you provide the information.
- With your consent.



Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our web-based services may then be inaccessible or not function properly.

Promotional Offers from the Company. If you do not (or no longer) wish to have your contact information used by the Company to promote our Products & Services, you can opt out at any time by sending us an email stating your request to ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI). If we have sent you a promotional email, you may click the "Unsubscribe" link included in that email to be omitted from future email distributions. Your opt-out by either of these methods does not apply to information provided to the Company as a result of your purchase, warranty registration, or other Use of any Products & Services or other transactions.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may send us an email stating your request to ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI). However, please know we do not currently sell data triggering that statute's opt-out requirements.

Confirming and/or Correcting Your Information

You may send us an email at ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI) to request confirmation of Your Information that we have in our possession, and/or to correct or delete any of same, except that (i) in most cases, we cannot delete such information without also terminating your access to some or all Products & Services and (ii) we may not accommodate a request to change Your Information if we believe such change would violate any Legal Requirements or cause such information to be incorrect.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

Information Security

We have implemented a variety of technical, physical, and administrative measures designed to secure your personal information and to protect it from accidental loss and unauthorized access, use, alteration, destruction and disclosure. However, due to the design of the Internet and other online and wireless technology systems and other factors outside our control, we cannot guarantee that communications between you and our servers or other systems will be free from unauthorized access by third parties or by government entities.

The safety and security of Your Information also depends on you. You remain responsible for protecting your user name and passwords and for the security of information in transit to us over these systems. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures implemented in connection with our Information Platforms and Products & Services.



Changes to Our Privacy Policy

It is our policy to post any changes we make to this Policy on this page. If any of such changes are material to how we treat our users' personal information, we will also notify you by email to the email address(es) we have on file for you. The date this Policy was last revised is identified at the top of the first page of this Policy. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically reviewing this Policy to stay informed about its contents. Your continued Use of our Products & Services after we make changes is deemed to be acceptance of those changes.

Contact Information

To ask questions or comment about this Policy or our privacy practices, please email us at ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI).

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about the California privacy rights applying to residents of the State of California, please continue to read the information below (the "**California Supplement**"), which supplements the information in our general Policy above and applies solely to California residents.

The California Supplement explains some additional rights and details that were introduced by the California Consumer Privacy Act of 2018 and related regulations (the "**CCPA**"). The words used in the California Supplement have the meanings given to them in the CCPA, which are often very broad. For example, the definition of "personal information" under the CCPA includes your name as well as more general information like how you navigate parts of our Information Platforms.

Categories of Information We Collect

As required by California law, including the CCPA, following is a list of the categories of personal information we have collected about California residents in the course of our business in the past 12 months. For more information on how we obtain this information, please refer to our general Policy above.

1. Identifiers — including real name, alias, postal address, email address, account name, Internet Protocol (IP) address, and online and other ID numbers assigned to your account.
2. Other personal information — including phone number, billing and shipping address, credit card information (if applicable and solely when provided by you), information about your relationship with your employer (such as title, position, and office contact information). This category includes personal information protected under pre-existing California law (Cal. Civ. Code 1798.80(e)) and overlaps with other categories.
3. Demographic information (including your age and/or gender) — if applicable and solely when provided by you. This type of personal information includes what is also considered a protected classification characteristic under pre-existing California or federal laws.
4. Commercial information on your interactions with our Information Platforms and Products & Services — including purchases and other commercial engagements with the Company.
5. Internet or other electronic network activity information — including browsing activity on our Information Platforms. This also encompasses other information that is collected automatically when you use our Information Platforms or interact with us through social media.
6. Geolocation data, inferred from your IP address, to help us deliver relevant content and enhance your experience.
7. Professional or employment-related data — solely when provided by you.



8. Inferences drawn from any of the above personal information — about your preferences, predispositions and behavior as they relate to our Information Platforms and Products & Services.

Purposes for our Information Collection

This notice section offers broad information about the business and commercial purposes for which we collect the information in the categories listed above. For further details about how we use the information we collect, please refer to our general Policy above.

We collect the above information for the business purpose of giving you access to our Information Platforms and Products & Services. This information is a key part of how we carry out services, account access, customer service, orders and transactions, customer research and feedback programs, analytics, and, where applicable, promotional and marketing services.

For commercial purposes, we collect information from the following categories: identifiers, demographic information, commercial information, Internet activity, geolocation data, professional data, and inferences.

CCPA Right to Know and Data Portability

Under the CCPA, you have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the “**right to know**”). Once we receive your request and confirm your identity (see [Exercising Your CCPA Rights to Know or Delete or Sale Opt-Out Right](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

CCPA Right to Delete

Under the CCPA, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “**right to delete**”). Once we receive your request and confirm your identity (see [Exercising Your CCPA Rights to Know or Delete or Sale Opt-Out Right](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or any of our service providers to:

1. Complete the transaction for which we collected the personal information, provide any Products & Services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with applicable Legal Requirements, or otherwise perform our contract with you.



2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another party to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*).
6. Engage in research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with customer or user expectations based on your relationship with us.
8. Comply with any legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete from (or de-identify in) our records your personal information not subject to one of the above exceptions and will direct our service providers to take similar action.

CCPA Right to Opt-Out of Sale of Personal Information

The Company does not sell personal information of the Users of our Information Platforms or other Products & Services, as the term “sell” is traditionally understood. But “sell” under the CCPA is broadly defined to include the sharing of personal information with third parties for various business purposes even if no money changes hands. For example, sharing a device identifier with a third party to perform services may be considered a “sale” under the CCPA.

To the extent that the Company might be deemed to “sell” your personal information (as such term is defined under the CCPA), you have the right to request to opt out of such “sales” on a going-forward basis (a “**Sale Opt-Out**”) at any time. Once we have received your request to opt out of the “sale” of your personal information and have confirmed your identity (see [Exercising Your CCPA Rights to Know or Delete or Sale Opt-Out Right](#)), we will no longer “sell” your personal information to third parties (except, if applicable, in an aggregated or de-identified manner so it is no longer personal information), but we will continue to share your personal information with any of our applicable service providers which process it on our behalf to allow us to provide you with Products & Services.

After 12 months, we may ask you if you want to opt back into the “sale” of your personal information. For further information, please refer to our general Policy above.

Exercising Your CCPA Rights to Know or Delete or Sale Opt-Out Right

To exercise your rights to know or delete or your Sale Opt-Out right described above (a “**CCPA Request**”), send us an email at ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI) specifically stating the request or requests being made. Please note that you may submit a right-to-know request only twice within any 12-month period.

You may designate someone else to make a CCPA Request on your behalf, but to protect your information, we will ask for a signed permission from you authorizing the other person to do so. We will contact you to verify your identity before we respond to your authorized agent's request.



Your CCPA Request must:

- Provide sufficient information to allow us to reasonably verify that the requestor is either (i) you (*i.e.*, the person about whom we collected the personal information at issue) or (ii) your authorized agent.
- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

We cannot respond to your CCPA Request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will use personal information provided in the CCPA Request only to verify the requestor's identity or authority to make the request.

Right to Request Accessible Alternative Format

If you need to access this Policy in an alternative format due to having a disability, please send us an email to that effect at ptlwprivacy@safefleet.net (in the case of PTLW) or feiprivacy@safefleet.net (in the case of FEI).

Right to Non-Discrimination

You have the right not to receive discriminatory treatment by us for the exercise of any of your rights.