# EROAD Group's Dashcam and Biometric Data Collection, Use and Retention Policy

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EROAD's Clarity dashcams ("Dashcams"), including both the Clarity and Clarity Edge models, collect, store and use video and audio recordings to help protect people and property, defend against legal claims, and support driver training. In addition, some Dashcams, including Clarity Edge and auxiliary fatigue monitoring cameras, collect, store and use advanced machine learning to monitor driver behaviours such as distraction, yawning, continuous eye closure, frequent blinking, mobile phone use, smoking, seatbelt usage, and camera obstruction.

Customers are responsible for installing EROAD Dashcams in their fleet vehicles and for determining which drivers operate vehicles equipped with these devices. Implementation of any EROAD Dashcam in a vehicle requires customers to obtain any legally required consent from drivers before the devices are used (see 'Dashcam Driver Consent' section below).

Dashcams do not explicitly identify individuals; rather, they record video and/or audio and/or analyse facial features, eye movement, or body and facial patterns to detect fatigue-related events. This data is handled strictly for purposes outlined in EROAD's Terms and EROAD's Privacy Policy and always in accordance with applicable legal requirements. The driver information generated by Dashcams must be used exclusively to manage safety-related events within the customer's fleet, to help defend against legal claims, and support driver training. For additional details about the Dashcams and recommended privacy practices, please see below.

## Dashcam Data Retention Period:

Personal data captured by the Dashcams for a specific driver is retained for up to 18 months by default. However, this retention period is configurable by our customers, with retention options ranging from 3 to 36 months. After this period, all personal data captured by the Dashcams is permanently deleted.

Customers retain control over their employees' data in the EROAD platform. Employees who wish to request deletion of their information outside these standard retention periods should contact their employer, who in turn can coordinate with EROAD.

**Dashcam Driver Consent (including for biometric data):**

Many jurisdictions, including the United States, Canada, New Zealand, and Australia, have laws that impose notice and consent requirements for how companies use, share, and store data, including video and audio data, that can be used to identify individuals. Additionally, some laws in certain jurisdictions may define fatigue data (such as data derived from analysing facial features or eye movement) as biometric data, even though this feature does not automatically identify individuals.

If you have drivers who reside or operate vehicles in these jurisdictions, these laws may apply to your use of Dashcams. The law in this area is changing rapidly. The information provided here is not intended to be legal advice or a substitute for legal advice. Please contact your legal representative if you have any questions or concerns.

EROAD requires our customers to comply with all applicable data privacy laws and as part of that requirement to provide notice and obtain consent where legally required. In some jurisdictions, this could include incorporating a notice and consent process into their driver onboarding and implementing their own Biometric Data Policy. For our customers' convenience, we've included the following consent form  and biometric data policy examples. Before using these examples, customers should make sure the examples work for their intended use of Dashcams.

***Example Consent Form***

*Consent to Collection of Dashcam Data/ Biometric Data*

*We use EROAD's hardware and software technology to manage our fleet and improve driver safety. The Dashcam feature will collect, store, and process video and/or audio information about you, including your face and/or voice for purposes of managing safety and driver behaviour events in the EROAD dashboard ("Dashcam Information").* ***[****The Dashcam Information may include biometric data regulated under applicable law****. – include if relevant in your jurisdiction]*** *The Dashcam Information is processed using either the Amazon Web Services (AWS) or Microsoft Azure cloud-based software. The Dashcam Information is retained until* ***[****18 months* ***or choose a shorter or longer period]*** *after the information is collected, at which point the Dashcam Information, [including any biometric data* ***– include if relevant****], will be permanently deleted. More information about the Dashcam may be found at EROAD's website: https://www.eroad.com/privacy-policy/ .*

*A copy of our* ***[****Biometric****]*** *Data Retention Policy is available on request*

*By signing below, you consent to EROAD's and* ***[****insert company name****]****'s collection, use, disclosure, and storage of your Dashcam Information as described above.*

*Signature: _____*

*Name: _____*

*Date: _____*

***Example Biometric Data Retention and Deletion Policy (Illinois)***

*[insert company name] Biometric Data Retention and Deletion Policy*

***Purpose***

*We use EROAD's hardware and software technology to manage our fleet and improve driver safety. EROAD's Dashcam feature uses facial recognition information to manage safety and driver behaviour events in the EROAD dashboard. This helps alert drivers and customers to unsafe driver behaviors, such as distraction, yawning, continuous eye closure, frequent blinking, mobile phone usage, smoking, unfastened seatbelts and covered camera lenses.*

***Policy***

*Our policy is to protect, store, and delete any biometric data in accordance with applicable laws, including, without limitation, the Illinois Biometric Information Privacy Act.*

***Retention and Destruction of Biometric Data***

*The Dashcam information is retained until **[**18 months or choose a shorter or longer period**]** after the information is collected, at which point the Dashcam information, including any biometric data, will be permanently deleted.*