

Privacy Policy – InFleet Driver Application

Last updated: 14th of May 2026

This Privacy Policy explains how personal data is processed when the **InFleet Driver Application** ("App") is used by drivers who are employees or contract employees, or authorised drivers of a corporate customer subscribing to the **InFleet Platform** (each such customer referred to as a "Subscriber"). The InFleet Platform and App are operated by **Toyota Connected India Private Limited**, an Indian corporation with office at UB City, Level 4, No. 24, Concorde Block Tower C, Vittal Mallya Rd, Bengaluru, Karnataka 560001 and branch office at Module 01, 10th Floor, B Block, IIT Madras Research Park, Kanagam Road, Taramani, Chennai - 600113 (hereinafter referred as "**TCIN**").

This Privacy Policy is intended to be uploaded on the App Store and Play Store for regulatory compliance and transparency purposes and applies uniformly to all Subscriber deployments of the InFleet platform.

1. Roles Under Data Protection Laws

For the purposes of applicable Indian data protection laws, including the Digital Personal Data Protection Act, 2023 (**DPDP Act**):

- **Data Fiduciary:** The corporate entity that subscribes to and uses the InFleet Platform ("Subscriber")
- **Data Processor:** Toyota Connected India Private Limited (TCIN)
- **Data Principals:** Drivers who are employees, contract employees, or authorised drivers of the Subscriber

TCIN processes personal data solely on behalf of and in accordance with the documented instructions or contractual obligation between TCIN and Subscriber.

2. Applicability of This Privacy Policy

This Privacy Policy applies exclusively to:

- Drivers using the InFleet Driver App under a business-to-business (**B2B**) / enterprise subscription; and
- Fleet and Transport operations configured and managed by the Subscriber through the InFleet Platform.

The App is not intended for individual consumers and does not create any direct contractual, employment, or fiduciary relationship between TCIN and the Drivers.

3. Categories of Personal Data Processed

Subject to the configurations and instructions by the subscriber, the following categories of personal data may be processed, subject to configuration by the Subscriber:

a. Driver Identification Data

- Name
- Employee ID / contractor or driver identifier
- Mobile number (used for authentication, OTP verification, and operational communication)
- Driver License Number
- Address
- Date of Birth

b. Vehicle & Trip Data

- Vehicle registration number and Vehicle Identification Number (VIN)

- Trip start and end time
- Pick-up and drop locations
- Assigned vehicle and route details
- Customer Name (Person taking the trip)

c. Location & Telematics Data

- Real-time or near real-time vehicle location
- Speed, driving alerts (such as over-speeding or geofence events)
- OBD device telemetry and vehicle diagnostics data

d. Technical & Usage Data

- Device identifiers
- App usage logs and timestamps
- Operating system and app version
- Mobile Data

Personal data is collected and processed only where mandated by law, contract to provide fleet management and operational services as determined by the Subscriber and are subject to enhanced access and security controls. The InFleet Driver App is not intended for use by minors. Drivers must be legally eligible under applicable law to operate motor vehicles and perform professional driving activities. TCIN does not knowingly process personal data of minors. Location and telematics data may be affected by device capability, network coverage, satellite availability, and environmental factors, and may not always be accurate or continuous.

4. Purpose of Processing

Personal data is processed strictly for the purposes defined and controlled by the Subscriber, which may include:

- Driver allocation and trip management
- Notifying Drivers of upcoming trips to pick up and drop expatriates or other authorised personnel
- Monitoring of trip execution and completion
- Fleet safety, compliance, and operational efficiency
- Regulatory, statutory, and internal compliance relating to transport and fleet operations
- Generation of operational reports and dashboards for the Subscriber
- Providing technical or operational support to drivers, where enabled by or requested by the Subscriber

TCIN does not use driver personal data for advertising, direct marketing, or independent commercial profiling purposes.

5. Legal Basis and Driver Information

The Subscriber is responsible for:

- Informing drivers about the nature and scope of data collection and monitoring
- Establishing a valid legal basis (including consent where required) under applicable labour, transport, and data protection laws

TCIN relies on the Subscriber's instructions and confirmations that such lawful basis has been duly obtained. TCIN processes personal data strictly as a Data Processor and does not independently determine the purpose or lawful basis of such processing.

6. Anonymised and Aggregated Data

TCIN may collect and use irreversibly anonymised and aggregated data derived from the InFleet Platform for:

- Internal analytics and performance measurement
- Platform improvement and feature enhancement
- Security monitoring and incident prevention
- Research and development of fleet-related products and services

Such anonymised data does not identify, and cannot be re-identified to, any individual driver or vehicle user.

7. Data Sharing and Disclosures

Personal data may be shared:

- With authorised personnel of the Subscriber
- With TCIN employees and contractors strictly on a need-to-know basis
- With third-party service providers (such as cloud infrastructure, telecom connectivity, SMS gateways, and mapping services) engaged to support the operation of the InFleet Platform

TCIN does not sell personal data and does not disclose personal data to third parties for purposes unrelated to the provision of InFleet services.

8. Data Retention

Personal data is retained:

- For the duration of the Subscriber's contractual relationship with TCIN; and
- Thereafter deleted or anonymised in accordance with TCIN's data retention policies and applicable legal requirements

Specific retention and deletion timelines are governed by the applicable Subscriber agreement.

9. Data Security

TCIN implements reasonable administrative, technical, and organisational measures to safeguard personal data, including:

- Logical and role-based access controls
- Encryption of data in transit and at rest (where applicable)
- Incident detection, response, and remediation mechanisms

These measures are designed to protect against unauthorised access, disclosure, alteration, or loss of personal data.

10. Data Principal Rights

Drivers may exercise their rights under applicable data protection laws (such as access, correction, erasure, or grievance redressal) through the Subscriber, who acts as the Data Fiduciary.

Requests received directly by TCIN will be redirected or handled in coordination with the relevant Subscriber, in accordance with contractual obligations and applicable law.

11. International Data Transfers

Personal data is processed primarily within India. Where cross-border processing or transfers are required, the same will be carried out in compliance with applicable Indian data protection laws including any restrictions or conditions notified by the Government of India under applicable data protection laws and Subscriber instructions.

12. Changes to This Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in legal requirements, platform functionality, or operational practices. The latest version will be made available through the App or through Subscriber communications.

13. Contact Information

For queries, concerns, or complaints relating to personal data processing, correction or erasure, drivers should contact their employer or contracting entity (the relevant Subscriber), as the Subscriber is the Fiduciary for managing these requests.

Subscriber entities may contact TCIN for data processing or privacy-related matters at:

Toyota Connected India Private Limited

Legal & Compliance Team

Email: tcin-legal@toyotaconnected.co.in

--- **Important Note for Drivers:** The InFleet Driver App is provided as part of professional or contractual fleet operations. Use of the App is subject to the Subscriber's internal policies, instructions, and applicable employment or contractual terms.

----- END -----