



# INDIVIDUAL CONSUMER CODE OF PRACTICE (ICCP)

---

PrimeTrack Telematics Nigeria Limited

As Approved by the **Nigerian Communications Commission (NCC)**

## 1. Regulatory Identification

### a. Description of Services

Before a contract is entered into, PrimeTrack Telematics Nigeria Ltd shall provide a complete description of its services in clear language. PrimeTrack Telematics Nigeria Ltd offers vehicle tracking and fleet telematics services to individuals and corporations. Services include real-time tracking, driver behavior monitoring, automated fleet maintenance scheduling and fleet analytics. All service information is published on our website ([primetracknigeria.com](http://primetracknigeria.com)) and social media platforms.

### b. Service Contract and Duration

A copy of the service contract is made available on our website or on request, written in clear and simple language. Contracts are available for a minimum contract period of 12 months, and the manner and consequences of termination, including procedure and charges for early termination.

### c. Service Subscription

We provide consumers with clear instructions on the medium and procedure for subscribing to a service, which includes subscription via our website at [primetracknigeria.com](http://primetracknigeria.com), through a designated customer representative at 08030609099, or in person at our office (4th floor Monarch Plaza, 65c Opebi Road, Ikeja Lagos).

### d. Contract Terms and Conditions

The contract includes information on: renewal terms; disconnection/reconnection fees; procedure for refund of deposits including timing and deductions; interruption/withdrawal of service; delivery/installation/activation and procedures for notifying the customer of changes to the service or its elements.

### e. Opt-in and Opt-Out

Telemarketing is conducted according to the consumer's recorded "call" or "don't call" preferences. Consumers are able to opt in or opt-out of receiving any unsolicited Short Messages Service (SMS) or voice calls using any code provided by the Commission. Services are streamlined to allow consumers to stop all unsolicited communications or select specific categories they wish to receive.



## **2. Advertisement and Representation of Services**

### **a. Availability of Service**

Advertisements promoting the availability of our service publish any known geographical or technical limitations (e.g., GSM network strength, GPS signal quality) that affect the recommended quality of service.

### **b. Advertisement of Packaged Services**

If a service is advertised as part of a package, all components will be supplied. This section is currently not applicable as all services are offered as a standalone solutions.

### **c. Disclaimer**

Any disclaimer used is understandable, does not negate the principal message of the advertisement, it is clear and written in plain language, and clearly specifies the intended consumer.

### **d. Tele-Marketing**

PrimeTrack Telematics Nigeria does not engage in unsolicited telemarketing. Any permissible follow-up or customer service calls will comply with the full provisions of the Regulations; disclosing our identity and purpose at the start of the call, stating the full price of any subject product/service during the call, and informing the recipient of their absolute right to cancel within 7 days.

All calls comply with the consumer's "do not call" preferences. The number of rings is limited to a maximum of three, with a maximum of two attempts per day.

## **3. Complaint Handling**

### **a. Complaint Processes**

Our complaints processes are transparent and readily accessible, including a physical address (4th floor Monarch Plaza, 65c Opebi Road, Ikeja Lagos), a helpline number (08030609099), via email at [admin@primetracknigeria.net](mailto:admin@primetracknigeria.net), a WhatsApp line (08033636033), and are accessible through our website ([primetracknigeria.com](http://primetracknigeria.com)) and social media platforms. The means of accepting complaints does not unduly deter consumers from making a complaint.

### **b. Further Recourse**

If a consumer is dissatisfied with a decision on a complaint, we provide an option to escalate the complaint within our organization. Complaints with a resolution period of seven days or more can be escalated to the Nigerian Communications Commission (NCC) after the resolution period.



### **c. Data Collection and Analysis**

We maintain appropriate digital recording systems for complaints and their outcomes. These records are categorized and analyzed quarterly to identify recurring problems and improve service quality.

### **d. Retention of Records**

Information recorded in relation to complaint handling shall be retained for twenty-four (24).

### **e. Prevention of Unsolicited SMS**

A consumer shall at all times be able to opt-out of receiving any unsolicited Short Message Service (SMS) utilizing any code provided by the Commission. PrimeTrack Telematics Nigeria Ltd does not send unsolicited SMS for marketing purposes.

## **4. Consumer Obligations**

Consumers are bound by PrimeTrack Telematics Nigeria Ltd terms upon signing the service agreement or commencing use of the service. They must grant PrimeTrack Telematics Nigeria Ltd access for maintenance. They must not misuse services (e.g. dishonest obtainment, sending obscene messages), tamper with equipment, resell service without authorization, or abuse mobile number portability to evade bills. This includes providing accurate information, ensuring timely payment, and avoiding unauthorized modifications to devices.

## **5. Protection of Consumer Information**

### **a. Data Gathering**

Information is fairly and lawfully collected for limited and identified purposes related to providing GPS tracking and fleet management services. It is limited to what is necessary and relevant. Consumers are provided notice of what information is collected and its use and are given choices regarding its collection, use, and disclosure during onboarding, in line with the Nigeria Data Protection Regulation (NDPR).

### **b. Data Storage**

Information is kept accurate, not longer than necessary, and is protected against improper or accidental disclosure through local hosting on encrypted servers, strict access controls, and 24/7 system monitoring. We retain and use consumer information as permitted under the Registration of Communications Subscribers Regulations and Data Protection Principles.

### **c. Data Sharing**

Information is not transferred to any party except as permitted by terms agreed with the consumer, by permission of the Commission, or as required by other applicable laws (e.g., formal requests from law enforcement). We do not sell, rent, or disclose customer data to third



parties for marketing purposes. Market analytics containing personally identifiable information are not transferred to a third party for revenue generation without prior notification and permission from the consumer.

## **6. Consumer Billing**

### **a. Billing Information**

The bill includes at a minimum consumer's name and address, Licensee's details, a unique bill identifier, billing period, description of charges, total amount payable, issue date, payment due date, payment methods, and contact details for billing inquiries. Invoices are communicated via email at [admin@primetracknigeria.net](mailto:admin@primetracknigeria.net) or WhatsApp at 08033636033.

### **b. Timing for Issuance of Bills**

A bill is processed and issued within 10 days of each billing period, including all charges incurred during that period.

### **c. Payment Confirmation**

Consumers are able to verify total bill payment by acknowledgement of payment sent via email at [admin@primetracknigeria.net](mailto:admin@primetracknigeria.net) and WhatsApp at 08033636033.

### **d. Billing Frequency**

Billing frequency is 60 days for standard subscription services. Daily, weekly, or monthly options are available depending on service type. Billing frequency is clearly communicated at subscription. Advance notification of charges is sent before billing

### **e. Prepaid Services**

All PrimeTrack Telematics Nigeria Ltd Telematics Nigeria Ltd services are prepaid. Our systems for recording and processing these prepaid transactions are included in references to "billing" under these Regulations.